

Agenda Item 1-B

CONFORMING AND CONSEQUENTIAL AMENDMENTS ARISING FROM DRAFT ISA 540 (REVISED)¹

Note to IAASB: All changes are shown as marked from extant. Changes subsequent to those exposed in ED-540 are highlighted in yellow. Comment boxes have been provided, where relevant, to indicate the previous text included in Agenda Item 2-D (Updated)² as presented at the December 2017 meeting.

ISA 200, Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance With International Standards on Auditing

Application and Other Explanatory Material

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Sufficient Appropriate Audit Evidence and Audit Risk (Ref: Para. 5 and 17)

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Audit Risk

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Risks of Material Misstatement

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A42. The ISAs do not ordinarily refer to inherent risk and control risk separately, but rather to a combined assessment of the “risks of material misstatement.” ~~However, Ordinarily, therefore,~~ the auditor may make separate or combined assessments of inherent and control risk depending on preferred audit techniques or methodologies and practical considerations. ~~However, ISA 540 (Revised)³ requires a separate assessment of inherent risk, and therefore of control risk, to provide a basis for designing and performing further audit procedures to respond to the assessed risks of material misstatement, including significant risks, at the assertion level in accordance with ISA 330.⁴~~ The assessment of the risks of material misstatement may be expressed in quantitative terms, such as in percentages, or in non-quantitative terms. In any case, the need for the auditor to make appropriate risk assessments is more important than the different approaches by which they may be made.

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December 2017 Agenda Item 2A Updated version:
The third sentence was proposed as:

“Nonetheless, ISA 540 (Revised) highlights the importance of the auditor’s consideration of both inherent and control risk in designing and performing further audit procedures to respond to the assessed risks of material misstatement, including significant risks, at the assertion level in accordance with ISA 330.”

¹ Draft ISA 540 (Revised), *Auditing Accounting Estimates and Disclosures*

² www.iaasb.org/system/files/meetings/files/20171211-IAASB_Agenda_Item_2-D-Conforming_and_Consequential_Amendments-UPDATED.pdf

³ ISA 540 (Revised), paragraph 13

⁴ ISA 330, paragraph 7(b)

ISA 230, *Audit Documentation*

Requirements

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Note: Paragraph 8 is provided for reference purposes only.

Documentation of the Audit Procedures Performed and Audit Evidence Obtained

Form, Content and Extent of Audit Documentation

8. The auditor shall prepare audit documentation that is sufficient to enable an experienced auditor, having no previous connection with the audit, to understand: (Ref: Para. A2–A5, A16–A17)
- (a) The nature, timing and extent of the audit procedures performed to comply with the ISAs and applicable legal and regulatory requirements; (Ref: Para. A6–A7)
 - (b) The results of the audit procedures performed, and the audit evidence obtained; and
 - (c) Significant matters arising during the audit, the conclusions reached thereon, and significant professional judgments made in reaching those conclusions. (Ref: Para. A8–A11)

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Application and Other Explanatory Material

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- A10. Some examples of circumstances in which, in accordance with paragraph 8, it is appropriate to prepare audit documentation relating to the use of professional judgment include, where the matters and judgments are significant:
- The rationale for the auditor's conclusion when a requirement provides that the auditor "shall consider" certain information or factors, and that consideration is significant in the context of the particular engagement.
 - The basis for the auditor's conclusion on the reasonableness of areas of subjective judgments (for example, the reasonableness of significant accounting estimates).
 - The basis for the auditor's evaluation of whether an accounting estimate and related disclosures are reasonable in the context of the applicable financial reporting framework, or are misstated.
 - The basis for the auditor's conclusions about the authenticity of a document when further investigation (such as making appropriate use of an expert or of confirmation procedures) is undertaken in response to conditions identified during the audit that caused the auditor to believe that the document may not be authentic.
 - When ISA 701 applies,⁵ the auditor's determination of the key audit matters or the determination that there are no key audit matters to be communicated.

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December 2017 Agenda Item 2A Updated version:
This bullet referred to "accounting estimates and related disclosures" i.e., plural rather than singular.

⁵ ISA 701, *Communicating Key Audit Matters in the Independent Auditor's Report*

ISA 260 (Revised), *Communication with Those Charged with Governance*

Requirements

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Matters to Be Communicated

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Note: Paragraph 16 is provided for reference purposes only.

Significant Findings from the Audit

16. The auditor shall communicate with those charged with governance: (Ref: Para. A17–A18)
- a) The auditor's views about significant qualitative aspects of the entity's accounting practices, including accounting policies, accounting estimates and financial statement disclosures. When applicable, the auditor shall explain to those charged with governance why the auditor considers a significant accounting practice, that is acceptable under the applicable financial reporting framework, not to be most appropriate to the particular circumstances of the entity; (Ref: Para. A19–A20)
 - b) Significant difficulties, if any, encountered during the audit; (Ref: Para. A21)
 - c) Unless all of those charged with governance are involved in managing the entity:
 - (i) Significant matters arising during the audit that were discussed, or subject to correspondence, with management; and (Ref: Para. A22)
 - (ii) Written representations the auditor is requesting;
 - d) Circumstances that affect the form and content of the auditor's report, if any; and (Ref: Para. A23–A25)
 - e) Any other significant matters arising during the audit that, in the auditor's professional judgment, are relevant to the oversight of the financial reporting process. (Ref: Para. A26–A28)

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Application and Other Explanatory Material

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Matters to Be Communicated

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Significant Findings from the Audit

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Significant Qualitative Aspects of Accounting Practices (Ref: Para. 16(a))

- A19. Financial reporting frameworks ordinarily allow for the entity to make accounting estimates, and judgments about accounting policies and financial statement disclosures, for example, in relation to

the use of key assumptions in the development of accounting estimates for which there is significant measurement uncertainty. In addition, law, regulation or financial reporting frameworks may require disclosure of a summary of significant accounting policies or make reference to “critical accounting estimates” or “critical accounting policies and practices” to identify and provide additional information to users about the most difficult, subjective or complex judgments made by management in preparing the financial statements.

A20. As a result, the auditor’s views on the subjective aspects of the financial statements may be particularly relevant to those charged with governance in discharging their responsibilities for oversight of the financial reporting process. For example, in relation to the matters described in paragraph A19, those charged with governance may be interested in the auditor’s views on the degree to which complexity, subjectivity or other inherent risk factors affect the selection or application of the methods, assumptions and data used in making an accounting estimate, and the evaluation of the adequacy/reasonableness of the amount and related disclosures included in the financial statements. Open and constructive communication about significant qualitative aspects of the entity’s accounting practices also may include comment on the acceptability of significant accounting practices and on the quality of the disclosures. This includes whether management’s decisions are the most appropriate in the circumstances of the entity, for example, when an alternative acceptable accounting practice would, in the auditor’s judgment, be more suitable in the circumstances. Appendix 23 of ISA 540 (Revised) identifies matters that may be included in this communication.

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December 2017 Agenda Item 2A Updated version:

The penultimate two sentences, commencing “Open and constructive” previously read:

“Open and constructive communication about significant qualitative aspects of the entity’s accounting practices also may include comment on the acceptability of significant accounting practices, including whether management’s decisions are the most appropriate in the circumstances of the entity when alternative acceptable accounting practices are available, and the quality of the disclosures.”

Appendix 1

(Ref: Para. 3)

Specific Requirements in ISQC 1 and Other ISAs that Refer to Communications with Those Charged With Governance

This appendix identifies paragraphs in ISQC 1⁶ and other ISAs that require communication of specific matters with those charged with governance. The list is not a substitute for considering the requirements and related application and other explanatory material in ISAs.

- ISQC 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements* – paragraph 30(a)
- ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements* – paragraphs 21, 38(c)(i) and 40-42
- ISA 250, *Consideration of Laws and Regulations in an Audit of Financial Statements* – paragraphs 14, 19 and 22-24
- ISA 265, *Communicating Deficiencies in Internal Control to Those Charged with Governance and Management* – paragraph 9
- ISA 450, *Evaluation of Misstatements Identified during the Audit* – paragraphs 12-13
- ISA 505, *External Confirmations* – paragraph 9
- ISA 510, *Initial Audit Engagements—Opening Balances* – paragraph 7
- ISA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures* – paragraph 26
- ISA 550, *Related Parties* – paragraph 27
- ISA 560, *Subsequent Events* – paragraphs 7(b)-(c), 10(a), 13(b), 14(a) and 17
- ISA 570 (Revised), *Going Concern* – paragraph 25
- ISA 600, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)* – paragraph 49
- ISA 610 (Revised 2013), *Using the Work of Internal Auditors* – paragraphs 20 and 31
- ISA 700 (Revised), *Forming an Opinion and Reporting on Financial Statements* – paragraph 46
- ISA 701, *Communicating Key Audit Matters in the Independent Auditor's Report* – paragraph 17
- ISA 705 (Revised), *Modifications to the Opinion in the Independent Auditor's Report* – paragraphs 12, 14, 23 and 30
- ISA 706 (Revised), *Emphasis of Matter Paragraphs and Other Matter Paragraphs in the Independent Auditor's Report* – paragraph 12
- ISA 710, *Comparative Information—Corresponding Figures and Comparative Financial Statements* – paragraph 18
- ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information* – paragraph 17—19

⁶ ISQC 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*

Appendix 2

(Ref: Para. 16(a), A19–A20)

Qualitative Aspects of Accounting Practices

The communication required by paragraph 16(a), and discussed in paragraphs A19–A20, may include such matters as:

Accounting Policies

Accounting Estimates and Related Disclosures

- For items for which estimates are significant, issues discussed in ISA 540 (Revised), including, for example:
 - How management identifies transactions, other events and conditions that give rise to the need for, or changes in, accounting estimates to be recognized or disclosed in the financial statements, and related disclosures.
 - Whether management's decisions relating to the recognition, measurement, presentation and disclosure of the accounting estimates and related disclosures in the financial statements are in accordance with the applicable financial reporting framework.
 - Whether there has been or ought to have been a change from the prior period in the methods for making the accounting estimates and, if so, why, as well as the outcome of accounting estimates in prior periods.
 - Whether management has applied appropriate specialized skills or knowledge or engaged appropriate experts.
 - Whether management's methods for making the accounting estimates, including when management has used a model, are appropriate in the context of the measurement objectives and other requirements of the applicable financial reporting framework.
 - Whether the significant data and significant assumptions used by management in making the accounting estimates are appropriate in the context of the requirements of the applicable financial reporting framework.
 - Whether significant assumptions are consistent with each other and with those used in other accounting estimates, or with assumptions used in other areas of the entity's business activities.
 - When relevant to the appropriateness of the significant assumptions or the appropriate application of the applicable financial reporting framework, whether management has the intent to carry out specific courses of action and has the ability to do so.
 - The relevance and reliability of information obtained from an external information source.
 - Risks of material misstatement.
 - Indicators of possible management bias.

- ~~How management has considered alternative assumptions or outcomes and why it has rejected them, or how management has otherwise addressed estimation uncertainty in making the accounting estimate.~~
- ~~The reasonableness of disclosures about estimation uncertainty in the financial statements.~~

ISA 500, *Audit Evidence*

Note to IAASB: As requested by the Board, ISA 500 has been presented in full below to enable a holistic consideration of the proposed content.

Introduction

Scope of this ISA

1. This International Standard on Auditing (ISA) explains what constitutes audit evidence in an audit of financial statements, and deals with the auditor's responsibility to design and perform audit procedures to obtain sufficient appropriate audit evidence to be able to draw reasonable conclusions on which to base the auditor's opinion.
2. This ISA is applicable to all the audit evidence obtained during the course of the audit. Other ISAs deal with specific aspects of the audit (for example, ISA 315⁷), the audit evidence to be obtained in relation to a particular topic (for example, ISA 570⁸), specific procedures to obtain audit evidence (for example, ISA 520⁹), and the evaluation of whether sufficient appropriate audit evidence has been obtained (ISA 200¹⁰ and ISA 330¹¹).

Effective Date

3. This ISA is effective for audits of financial statements for periods beginning on or after December 15, 2009.

Objective

4. The objective of the auditor is to design and perform audit procedures in such a way as to enable the auditor to obtain sufficient appropriate audit evidence to be able to draw reasonable conclusions on which to base the auditor's opinion.

Definitions

5. For purposes of the ISAs, the following terms have the meanings attributed below:
 - (a) Accounting records – The records of initial accounting entries and supporting records, such as checks and records of electronic fund transfers; invoices; contracts; the general and subsidiary ledgers, journal entries and other adjustments to the financial statements that are not reflected in journal entries; and records such as work sheets and spreadsheets supporting cost allocations, computations, reconciliations and disclosures.

⁷ ISA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and Its Environment*

⁸ ISA 570 (Revised), *Going Concern*

⁹ ISA 520, *Analytical Procedures*

¹⁰ ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance*

¹¹ ISA 330, *The Auditor's Procedures in Response to Assessed Risks*

- (b) Appropriateness (of audit evidence) – The measure of the quality of audit evidence; that is, its relevance and its reliability in providing support for the conclusions on which the auditor's opinion is based.
- (c) Audit evidence – Information used by the auditor in arriving at the conclusions on which the auditor's opinion is based. Audit evidence includes both information contained in the accounting records underlying the financial statements and other information.
- (cA) External information source – An external individual or organization, when providing information suitable for use by a broad range of users that has been used either by: (Ref: Para. A1A-A1C)
- (i) the entity in preparing the financial statements; or
 - (ii) the auditor as audit evidence,
- other than when the individual or organization is acting in the capacity of a management's expert, service organization¹², or auditor's expert.
- (d) Management's expert – An individual or organization possessing expertise in a field other than accounting or auditing, whose work in that field is used by the entity to assist the entity in preparing the financial statements.
- (e) Sufficiency (of audit evidence) – The measure of the quantity of audit evidence. The quantity of the audit evidence needed is affected by the auditor's assessment of the risks of material misstatement and also by the quality of such audit evidence.

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External information source – An external individual or organization, which provides information that is suitable for use by a broad range of users and has been used either by: (Ref: Para. A1A–A1C)

- (i) the entity in preparing the financial statements, other than information obtained from a management's expert or a service organization; or
- (ii) the auditor as audit evidence, other than evidence obtained from an auditor's expert.

Requirements

Sufficient Appropriate Audit Evidence

6. The auditor shall design and perform audit procedures that are appropriate in the circumstances for the purpose of obtaining sufficient appropriate audit evidence. (Ref: Para. A1-A25)

Information to Be Used as Audit Evidence

7. When designing and performing audit procedures, the auditor shall consider the relevance and reliability of the information to be used as audit evidence, including information obtained from an external information source. (Ref: Para. A26-A33H)
8. If information to be used as audit evidence has been prepared using the work of a management's expert, the auditor shall, to the extent necessary, having regard to the significance of that expert's work for the auditor's purposes, (Ref: Para. A34-A36)
- (a) Evaluate the competence, capabilities and objectivity of that expert; (Ref: Para. A37-A43)
 - (b) Obtain an understanding of the work of that expert; and (Ref: Para. A44-A47)
 - (c) Evaluate the appropriateness of that expert's work as audit evidence for the relevant assertion. (Ref: Para. A48)
9. When using information produced by the entity the auditor shall evaluate whether the information is sufficiently reliable for the auditor's purposes, including as necessary in the circumstances:

¹² ISA 402, paragraph 8.

- (a) Obtaining audit evidence about the accuracy and completeness of the information; (Ref: Para. A49-A50)
- (b) Evaluating whether the information is sufficiently precise and detailed for the auditor's purposes; and (Ref: Para. A51)

Selecting Items for Testing to Obtain Audit Evidence

10. When designing tests of controls and tests of details, the auditor shall determine means of selecting items for testing that are effective in meeting the purpose of the audit procedure. (Ref: Para. A52-A56)

Inconsistency in, or Doubts over Reliability of, Audit Evidence

11. If:
- (a) Audit evidence obtained from one source is inconsistent with that obtained from another; or
 - (b) The auditor has doubts over the reliability of information to be used as audit evidence,
- the auditor shall determine what modifications or additions to audit procedures are necessary to resolve the matter, and shall consider the effect of the matter, if any, on other aspects of the audit. (Ref: Para. A57)

Application and Other Explanatory Material

External Information Source (Ref: Para 5(cA))

A1A. Information obtained from an external information source used by the entity in preparing the financial statements may be used as audit evidence when its relevance and reliability has been considered, as further explained in paragraphs A33A-A33F. The auditor may also independently obtain information from an external information source to use as audit evidence.

A1B. External information sources may include pricing services, governmental organizations, central banks or recognized stock exchanges. Examples of information that may be obtained from external information sources include:

- Prices and pricing related data;
- Macro-economic data such as historical and forecast unemployment rates and economic growth rates, or census data;
- Credit history data;
- Industry specific data such as an index of reclamation costs for certain extractive industries or viewership information or ratings used to determine advertising revenue in the entertainment industry; and
- Mortality tables used to determine liabilities in the life insurance and pension sectors.

A1Aa. When an external individual or organization provides a specific set of information that is suitable for use by a broad range of users, either for use by the entity in preparing the financial statements or by an auditor as audit evidence, it may be less likely that management or the auditor will be able to influence the external information source. In such circumstances, as long as the individual or

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December 2017 Agenda Item 2A Updated version: A1A and A1Aa previously read:

"A1A. In preparing the financial statements, management may make use of information obtained from an external information source or may make use of a management's expert or service organization. ISA 402 addresses the responsibilities of the auditor in obtaining sufficient appropriate audit evidence when an entity uses a service organization. An external individual or organization may be acting as an external information source, rather than as a management's expert or service organization, in respect of a specific set of information, when the information obtained by the entity is suitable for use by a broad range of users. Such information may be obtained for free, if the information is in the public domain, or in return for payment of a fee to the relevant external information source. In such circumstances, it is less likely that management will be able to influence the external information source.

A1Aa. The auditor may also obtain information from an external information source as part of further audit procedures to consider the relevance and reliability of management's internally produced information.

organization is not acting in the capacity of a management's expert or service organization or auditor's expert, it is acting as an external information source. Such information may be obtained for free, if the information is in the public domain, or in return for payment of a fee to the individual or organization. ISA 402 addresses the responsibilities of the auditor in obtaining sufficient appropriate audit evidence when an entity uses a service organization. ISA 620 addresses the responsibilities of the auditor when an individual or organization is acting as an auditor's expert.

A1C. An individual or organization cannot, in respect of any individual set of information, be both an external information source and a management's expert, an auditor's expert or a service organization.

A1Ca. However, an individual or organization may, for example, be acting as a management's expert when providing one set of information but may be acting as an external information source when providing a different set of information. In some circumstances, the distinction may be clear. In other circumstances, professional judgment may be needed to determine whether an individual or organization is acting as an external information source or as a management's expert with respect to a particular set of information. For example:

- An external organization may be acting as an external information source with respect to data about real estate prices when that information is suitable for use by a broad range of users, for example, information generally available pertaining to a geographical region. The same external organization may also be acting as a management's expert for the same entity in providing management with a valuation service, with respect to the entity's real estate portfolio, if that information is specifically tailored for the entity's facts and circumstances.
- Some actuarial organizations publish mortality tables for general use which, when used by an entity, may be considered to be information from an external information source. The same actuarial organization may also be a management's expert if it provides entity-specific tailored information to help management determine the pension liability for several of the entity's pension plans.
- An individual or organization may possess expertise in the application of models to estimate the fair value of securities for which there is no observable market. If the individual or organization applies that expertise in making an estimate specifically for the entity and which the entity uses in preparing its financial statements, the individual or organization is a management's expert. If, on the other hand, that individual or organization merely provides prices or pricing-related data regarding private transactions to the public, and the entity uses that information in its own estimation methods, the individual or organization is an external information source.
- An individual or organization may publish information specific to risks or conditions unique to an industry or market. If an entity uses that information in support of market risk disclosures, the individual or organization may be considered an external information source when the information is relevant to all participants in the industry or market. If the information has been prepared specifically to describe risks tailored to the entity's circumstances, the individual or organization is acting as a management's expert.
- An entity may commission work from an external individual or organization to research and develop, using its own expertise, information about current and future market trends tailored to the entity's specific products or services, which is intended to be used by the entity to inform

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December 2017 Agenda Item 2A Updated version:
Minor redrafting to lead-in and two final bullets added as additional examples.

assumptions it uses in making accounting estimates. The auditor may also consider that the information is suitable for use by a broad range of entities with similar products or services. However, as the external individual or organization is supplying tailored information in response to a specific commission to perform work using its expertise, it is acting as a management's expert, and it could, in so doing, be influenced by the entity. If the information is also suitable for use by, or subsequently made available to, other parties, that does not change the position that it was initially provided by a management's expert.

Information to Be Used as Audit Evidence

Sufficient Appropriate Audit Evidence (Ref: Para. 6)

- A1. Audit evidence is necessary to support the auditor's opinion and report. It is cumulative in nature and is primarily obtained from audit procedures performed during the course of the audit. It may, however, also include information obtained from other sources such as previous audits (provided the auditor has determined whether changes have occurred since the previous audit that may affect its relevance to the current audit¹³) or a firm's quality control procedures for client acceptance and continuance. ~~In addition to other sources inside and outside the entity, the entity's accounting records and other sources internal to the entity~~ are an important source of audit evidence. ~~Also However,~~ information that may be used as audit evidence may have been prepared using the work of a management's expert ~~or be obtained from an external information source~~. Audit evidence comprises both information that supports and corroborates management's assertions, and any information that contradicts such assertions. In addition, in some cases the absence of information (for example, management's refusal to provide a requested representation) is used by the auditor, and therefore, also constitutes audit evidence.
- A2. Most of the auditor's work in forming the auditor's opinion consists of obtaining and evaluating audit evidence. Audit procedures to obtain audit evidence can include inspection, observation, confirmation, recalculation, reperformance and analytical procedures, often in some combination, in addition to inquiry. Although inquiry may provide important audit evidence, and may even produce evidence of a misstatement, inquiry alone ordinarily does not provide sufficient audit evidence of the absence of a material misstatement at the assertion level, nor of the operating effectiveness of controls.
- A3. As explained in ISA 200,¹⁴ reasonable assurance is obtained when the auditor has obtained sufficient appropriate audit evidence to reduce audit risk (i.e., the risk that the auditor expresses an inappropriate opinion when the financial statements are materially misstated) to an acceptably low level.
- A4. The sufficiency and appropriateness of audit evidence are interrelated. Sufficiency is the measure of the quantity of audit evidence. The quantity of audit evidence needed is affected by the auditor's assessment of the risks of misstatement (the higher the assessed risks, the more audit evidence is likely to be required) and also by the quality of such audit evidence (the higher the quality, the less may be required). Obtaining more audit evidence, however, may not compensate for its poor quality.
- A5. Appropriateness is the measure of the quality of audit evidence; that is, its relevance and its reliability

¹³ ISA 315 (Revised), paragraph 9

¹⁴ ISA 200, paragraph 5.

in providing support for the conclusions on which the auditor's opinion is based. The reliability of evidence is influenced by its source and by its nature, and is dependent on the individual circumstances under which it is obtained.

- A6. ISA 330 requires the auditor to conclude whether sufficient appropriate audit evidence has been obtained.¹⁵ Whether sufficient appropriate audit evidence has been obtained to reduce audit risk to an acceptably low level, and thereby enable the auditor to draw reasonable conclusions on which to base the auditor's opinion, is a matter of professional judgment. ISA 200 contains discussion of such matters as the nature of audit procedures, the timeliness of financial reporting, and the balance between benefit and cost, which are relevant factors when the auditor exercises professional judgment regarding whether sufficient appropriate audit evidence has been obtained.

Sources of Audit Evidence

- A7. Some audit evidence is obtained by performing audit procedures to test the accounting records, for example, through analysis and review, reperforming procedures followed in the financial reporting process, and reconciling related types and applications of the same information. Through the performance of such audit procedures, the auditor may determine that the accounting records are internally consistent and agree to the financial statements.
- A8. More assurance is ordinarily obtained from consistent audit evidence obtained from different sources or of a different nature than from items of audit evidence considered individually. For example, corroborating information obtained from a source independent of the entity may increase the assurance the auditor obtains from audit evidence that is generated internally, such as evidence existing within the accounting records, minutes of meetings, or a management representation.
- A9. Information from sources independent of the entity that the auditor may use as audit evidence may include **information from an external information source**, confirmations from third parties, analysts' reports, and comparable data about competitors (benchmarking data).

Audit Procedures for Obtaining Audit Evidence

- A10. As required by, and explained further in, ISA 315 and ISA 330, audit evidence to draw reasonable conclusions on which to base the auditor's opinion is obtained by performing:
- (a) Risk assessment procedures; and
 - (b) Further audit procedures, which comprise:
 - (i) Tests of controls, when required by the ISAs or when the auditor has chosen to do so; and
 - (ii) Substantive procedures, including tests of details and substantive analytical procedures.
- A11. The audit procedures described in paragraphs A14-A25 below may be used as risk assessment procedures, tests of controls or substantive procedures, depending on the context in which they are applied by the auditor. As explained in ISA 330 (Redrafted), audit evidence obtained from previous audits may, in certain circumstances, provide appropriate audit evidence where the auditor performs

¹⁵ ISA 330, paragraph 26.

audit procedures to establish its continuing relevance.¹⁶

- A12. The nature and timing of the audit procedures to be used may be affected by the fact that some of the accounting data and other information may be available only in electronic form or only at certain points or periods in time. For example, source documents, such as purchase orders and invoices, may exist only in electronic form when an entity uses electronic commerce, or may be discarded after scanning when an entity uses image processing systems to facilitate storage and reference.
- A13. Certain electronic information may not be retrievable after a specified period of time, for example, if files are changed and if backup files do not exist. Accordingly, the auditor may find it necessary as a result of an entity's data retention policies to request retention of some information for the auditor's review or to perform audit procedures at a time when the information is available.

Inspection

- A14. Inspection involves examining records or documents, whether internal or external, in paper form, electronic form, or other media, or a physical examination of an asset. Inspection of records and documents provides audit evidence of varying degrees of reliability, depending on their nature and source and, in the case of internal records and documents, on the effectiveness of the controls over their production. An example of inspection used as a test of controls is inspection of records for evidence of authorization.
- A15. Some documents represent direct audit evidence of the existence of an asset, for example, a document constituting a financial instrument such as a stock or bond. Inspection of such documents may not necessarily provide audit evidence about ownership or value. In addition, inspecting an executed contract may provide audit evidence relevant to the entity's application of accounting policies, such as revenue recognition.
- A16. Inspection of tangible assets may provide reliable audit evidence with respect to their existence, but not necessarily about the entity's rights and obligations or the valuation of the assets. Inspection of individual inventory items may accompany the observation of inventory counting.

Observation

- A17. Observation consists of looking at a process or procedure being performed by others, for example, the auditor's observation of inventory counting by the entity's personnel, or of the performance of control activities. Observation provides audit evidence about the performance of a process or procedure, but is limited to the point in time at which the observation takes place, and by the fact that the act of being observed may affect how the process or procedure is performed. See ISA 501 for further guidance on observation of the counting of inventory.¹⁷

External Confirmation

- A18. An external confirmation represents audit evidence obtained by the auditor as a direct written response to the auditor from a third party (the confirming party), in paper form, or by electronic or other medium. External confirmation procedures frequently are relevant when addressing assertions associated with certain account balances and their elements. However, external confirmations need

¹⁶ ISA 330, paragraph A35.

¹⁷ ISA 501, *Audit Evidence—Additional Considerations for Specific Items*

not be restricted to account balances only. For example, the auditor may request confirmation of the terms of agreements or transactions an entity has with third parties; the confirmation request may be designed to ask if any modifications have been made to the agreement and, if so, what the relevant details are. External confirmation procedures also are used to obtain audit evidence about the absence of certain conditions, for example, the absence of a “side agreement” that may influence revenue recognition. See [proposed] ISA 505 (Revised and Redrafted) for further guidance.¹⁸

Recalculation

- A19. Recalculation consists of checking the mathematical accuracy of documents or records. Recalculation may be performed manually or electronically.

Reperformance

- A20. Repperformance involves the auditor's independent execution of procedures or controls that were originally performed as part of the entity's internal control.

Analytical Procedures

- A21. Analytical procedures consist of evaluations of financial information made through analysis of plausible relationships among both financial and non-financial data. Analytical procedures also encompass such investigation as is necessary of identified fluctuations and relationships that are inconsistent with other relevant information or that differ from expected values by a significant amount. See ISA 520 for further guidance.

Inquiry

- A22. Inquiry consists of seeking information of knowledgeable persons, both financial and non-financial, within the entity or outside the entity. Inquiry is used extensively throughout the audit in addition to other audit procedures. Inquiries may range from formal written inquiries to informal oral inquiries. Evaluating responses to inquiries is an integral part of the inquiry process.
- A23. Responses to inquiries may provide the auditor with information not previously possessed or with corroborative audit evidence. Alternatively, responses might provide information that differs significantly from other information that the auditor has obtained, for example, information regarding the possibility of management override of controls. In some cases, responses to inquiries provide a basis for the auditor to modify or perform additional audit procedures.
- A24. Although corroboration of evidence obtained through inquiry is often of particular importance, in the case of inquiries about management intent, the information available to support management's intent may be limited. In these cases, understanding management's past history of carrying out its stated intentions, management's stated reasons for choosing a particular course of action, and management's ability to pursue a specific course of action may provide relevant information to corroborate the evidence obtained through inquiry.
- A25. In respect of some matters, the auditor may consider it necessary to obtain written representations from management and, where appropriate, those charged with governance to confirm responses to

¹⁸ ISA 505, *External Confirmations*

oral inquiries. See ISA 580 for further guidance.¹⁹

Information to Be Used as Audit Evidence

Relevance and Reliability (Ref: Para. 7)

A26A. Information from an external information source, whether obtained and used by the entity in preparing the financial statements or obtained independently by the auditor, may be identified and used as audit evidence as part of risk assessment procedures or further audit procedures, subject to considering the relevance and reliability of the information.

Commented [A7]:
December 2017 Agenda Item 2A Updated version:
Formerly part of paragraph A1Aa. Moved and expanded.

A26. As noted in paragraph A1, while audit evidence is primarily obtained from audit procedures performed during the course of the audit, it may also include information obtained from other sources such as, for example previous audits, in certain circumstances, and a firm's quality control procedures for client acceptance and continuance. The quality of all audit evidence is affected by the relevance and reliability of the information upon which it is based.

Relevance

A27. Relevance deals with the logical connection with, or bearing upon, the purpose of the audit procedure and, where appropriate, the assertion under consideration. The relevance of information to be used as audit evidence may be affected by the direction of testing. For example, if the purpose of an audit procedure is to test for overstatement in the existence or valuation of accounts payable, testing the recorded accounts payable may be a relevant audit procedure. On the other hand, when testing for understatement in the existence or valuation of accounts payable, testing the recorded accounts payable would not be relevant, but testing such information as subsequent disbursements, unpaid invoices, suppliers' statements, and unmatched receiving reports may be relevant.

A28. A given set of audit procedures may provide audit evidence that is relevant to certain assertions, but not others. For example, inspection of documents related to the collection of receivables after the period end may provide audit evidence regarding existence and valuation, but not necessarily cutoff. Similarly, obtaining audit evidence regarding a particular assertion, for example, the existence of inventory, is not a substitute for obtaining audit evidence regarding another assertion, for example, the valuation of that inventory. On the other hand, audit evidence from different sources or of a different nature may often be relevant to the same assertion.

A29. Tests of controls are designed to evaluate the operating effectiveness of controls in preventing, or detecting and correcting, material misstatements at the assertion level. Designing tests of controls to obtain relevant audit evidence includes identifying conditions (characteristics or attributes) that indicate performance of a control, and deviation conditions which indicate departures from adequate performance. The presence or absence of those conditions can then be tested by the auditor.

A30. Substantive procedures are designed to detect material misstatements at the assertion level. They comprise tests of details and substantive analytical procedures. Designing substantive procedures includes identifying conditions relevant to the purpose of the test that constitute a misstatement in the relevant assertion.

¹⁹ ISA 580, *Written Representations*

Reliability

A31. The reliability of information to be used as audit evidence, and therefore of the audit evidence itself, is influenced by its source and its nature, and the circumstances under which it is obtained, including the controls over its preparation and maintenance where relevant. Therefore, generalizations about the reliability of various kinds of audit evidence are subject to important exceptions. Even when information to be used as audit evidence is obtained from sources external to the entity, circumstances may exist that could affect its reliability. For example, information obtained from an independent external source may not be reliable if the source is not knowledgeable, or a management's expert may lack objectivity. While recognizing that exceptions may exist, the following generalizations about the reliability of audit evidence may be useful:

- The reliability of audit evidence is increased when it is obtained from independent sources outside the entity.
- The reliability of audit evidence that is generated internally is increased when the related controls, including those over its preparation and maintenance, imposed by the entity are effective.
- Audit evidence obtained directly by the auditor (for example, observation of the application of a control) is more reliable than audit evidence obtained indirectly or by inference (for example, inquiry about the application of a control).
- Audit evidence in documentary form, whether paper, electronic, or other medium, is more reliable than evidence obtained orally (for example, a contemporaneously written record of a meeting is more reliable than a subsequent oral representation of the matters discussed).
- Audit evidence provided by original documents is more reliable than audit evidence provided by photocopies or facsimiles, or documents that have been filmed, digitized or otherwise transformed into electronic form, the reliability of which may depend on the controls over their preparation and maintenance.

A32. ISA 520 provides further guidance regarding the reliability of data used for purposes of designing analytical procedures as substantive procedures.²⁰

A33. ISA 240 deals with circumstances where the auditor has reason to believe that a document may not be authentic, or may have been modified without that modification having been disclosed to the auditor.

External Information Sources

A33A. Obtaining an understanding of why management uses an external information source, and how management considered the relevance and reliability of the information, including its accuracy and completeness, for use in preparing its financial statements, helps to inform the auditor's consideration of the relevance and reliability of that information. Similar considerations are also relevant when the auditor independently obtains information from an external information source to use as audit evidence.

A33B. Depending on the circumstances, including whether the information has been obtained by management or the auditor, the following factors may be important when considering the relevance and reliability of information obtained from an external information source, including its accuracy and

²⁰ ISA 520, paragraph 5(a)

completeness:

- The nature and authority of the external information source. For example, a central bank or government statistics office with a legislative mandate to provide industry information to the public is likely to be an authority for certain types of information;
- Any relationships between the entity and the information source and the ability of management to influence the information obtained;
- The competence and reputation of the external information source with respect to the information, including whether the information is routinely provided by the source;
- Past experience of the auditor with the reliability of the information provided by the external information source;
- Relevant controls over the information obtained and used by management;
- Whether the information was developed taking into account the applicable financial reporting framework;
- Whether the information is suitable for use in the manner in which it is being used by management or the auditor;
- The nature and extent of disclaimers or other restrictive language relating to the information obtained;
- When available, information about the methods used in preparing the information, how the methods are being applied including, where applicable, how models have been used in such application, and the controls over the methods; and
- When available, information regarding the appropriateness of assumptions and other data applied by the external information sources in developing the information obtained.

A33F. As part of the consideration of the relevance and reliability of information from external information sources, one or more of the following may be relevant:

- Performing procedures at the external information source to understand the processes, techniques, and assumption used, including identifying, understanding and, when relevant, testing the operating effectiveness of relevant controls.
- Performing a comparison of information obtained from the external information source with information obtained from an alternative external information source, if available.
- When relevant to considering management's use of an external information source, testing of the operating effectiveness of controls management has in place to assess the reliability of the information from external information sources.

Note: The following four paragraphs will be moved to ISA 540 (Revised) (and updated as appropriate) to be application material to paragraph 18D as specific considerations relating to accounting estimates in complying with ISA 500 paragraph 7.

A33Fa. As explained in paragraph A31, the reliability of information is influenced by its source, its nature, and the circumstances under which it is obtained. Consequently, the nature and extent of the auditor's further audit procedures to consider the reliability of the information may vary depending on the nature of these factors. For example:

- Information from a credible central bank or government, such as an inflation rate, may simply involve corroboration to the bank's website or government website.
- Information from an industry expert body may be corroborated to a report, or reports, issued by that body.
- When prices, or pricing related data, are obtained from a single external information source, specializing in such information, the auditor may seek an independent price from an alternative source, if available.
- When prices, or pricing related data, is obtained from multiple external information sources and provides evidence of consensus across those sources, the auditor may need to obtain less evidence about how individual sources developed their information.
- When information obtained from multiple information sources points to divergent market views, the auditor would ordinarily seek to understand the estimation uncertainty involved and reasons for the diversity in views. For example, one source may be using current prices and another source using future prices. When the diversity reflects inherent measurement uncertainty, the auditor may need to consider the reasonableness of disclosures made in the financial statements about the resulting estimation uncertainty. In such cases professional judgment is also important in the selection of appropriate methods, assumptions or data.
- When information has been derived from a model, and the auditor is unable to obtain information about the model methodology, the auditor may consider whether it is necessary to recreate the model, depending on the significance of the use of the information obtained from the external information source.

A33G. For fair value measurement, additional considerations of the relevance and reliability of information obtained from external information sources may also include the following:

- (a) Whether fair values are based on trades of the same instrument or active market quotations;
- (b) When the fair values are based on transactions of comparable assets or liabilities, how those transactions are identified and considered comparable;
- (c) When there are no transactions either for the asset or liability or comparable assets or liabilities, how the information was developed including whether the inputs developed and used represent the assumptions that market participants would use when pricing the asset or liability, if applicable; and
- (d) When the fair value measurement is based on a broker quote, whether the broker quote:
 - (i) Is from a market maker who transacts in the same type of financial instrument;

- (ii) Is binding or nonbinding, with more weight placed on quotes based on binding offers; and
- (iii) Reflects market conditions as of the date of the financial statements, when required by the applicable financial reporting framework.

A33C. In many circumstances, information regarding the methods, assumptions and other data applied by the external information source in developing the information may not be available and the auditor may not be able to consider the accuracy and completeness of the information as there may be no contractual relationship between the external information source that requires the provision of information, or the external information source may refuse to provide information considered to be intellectual property.

A33D. The availability of sufficiently granular information to understand the methods, assumptions and other data used by the external information source may also be limited in some respects and consequently influence the auditor's consideration of the nature, timing and extent of procedures to perform. For example, pricing services often provide information about their methods and assumptions by asset class rather than individual securities. Brokers often provide only limited information about their inputs and assumptions when providing broker indicative quotes for individual securities. The complexity of the method may also influence the auditor's views as to the extent of procedures to perform to obtain sufficient appropriate evidence about the relevance and reliability of the information.

A33Ga. When the auditor is unable to obtain sufficient appropriate audit evidence to consider the relevance and reliability of information from an external information source, as a result of restrictions placed by the external information source on the provision of supporting, the auditor may have a limitation on scope if sufficient appropriate audit evidence cannot be obtained through alternative procedures. Any imposed limitation on scope is evaluated in accordance with the requirements of ISA 705.

A33H. In some situations, there may be only one provider of certain information. In such cases, the auditor's determination of the nature and extent of procedures that would be appropriate in the circumstances in considering the relevance and reliability of that information is influenced both by the nature and source of the information, as described in paragraphs A33A and A33B, as well as how management or the auditor has used that information. For example, in the absence of any alternative independent information source against which to compare, the auditor may determine that performing procedures at the external information source, as described in paragraph A33F, may be necessary in order to obtain sufficient appropriate audit evidence when the use of that information by the entity is significant to financial reporting. In other cases, for example, when the information is from an authoritative source or when the risk of material misstatement associated with management's use of that information is at the lower end of the spectrum, the extent of the auditor's further audit procedures may be less.

Reliability of Information Produced by a Management's Expert (Ref: Para. 8)

A34. The preparation of an entity's financial statements may require expertise in a field other than accounting or auditing, such as actuarial calculations, valuations, or engineering data. The entity may employ or engage experts in these fields to obtain the needed expertise to prepare the financial statements. Failure to do so when such expertise is necessary increases the risks of material misstatement.

- A35. When information to be used as audit evidence has been prepared using the work of a management's expert, the requirement in paragraph 8 of this ISA applies. For example, an individual or organization may possess expertise in the application of models to estimate the fair value of securities for which there is no observable market. If the individual or organization applies that expertise in making an estimate which the entity uses in preparing its financial statements, the individual or organization is a management's expert and paragraph 8 applies. If, on the other hand, that individual or organization merely provides price data regarding private transactions not otherwise available to the entity which the entity uses in its own estimation methods, such information, if used as audit evidence, is subject to paragraph 7 of this ISA, but is not the use of a management's expert by the entity.
- A36. The nature, timing and extent of audit procedures in relation to the requirement in paragraph 8 of this ISA, may be affected by such matters as:
- The nature and complexity of the matter to which the management's expert relates.
 - The risks of material misstatement in the matter.
 - The availability of alternative sources of audit evidence.
 - The nature, scope and objectives of the management's expert's work.
 - Whether the management's expert is employed by the entity, or is a party engaged by it to provide relevant services.
 - The extent to which management can exercise control or influence over the work of the management's expert.
 - Whether the management's expert is subject to technical performance standards or other professional or industry requirements.
 - The nature and extent of any controls within the entity over the management's expert's work.
 - The auditor's knowledge and experience of the management's expert's field of expertise.
 - The auditor's previous experience of the work of that expert.

The Competence, Capabilities and Objectivity of a Management's Expert (Ref: Para. 8(a))

- A37. Competence relates to the nature and level of expertise of the management's expert. Capability relates the ability of the management's expert to exercise that competence in the circumstances. Factors that influence capability may include, for example, geographic location, and the availability of time and resources. Objectivity relates to the possible effects that bias, conflict of interest or the influence of others may have on the professional or business judgment of the management's expert. The competence, capabilities and objectivity of a management's expert, and any controls within the entity over that expert's work, are important factors in relation to the reliability of any information produced by a management's expert.
- A38. Information regarding the competence, capabilities and objectivity of a management's expert may come from a variety of sources, such as:
- Personal experience with previous work of that expert.
 - Discussions with that expert.
 - Discussions with others who are familiar with that expert's work.

- Knowledge of that expert's qualifications, membership of a professional body or industry association, license to practice, or other forms of external recognition.
- Published papers or books written by that expert.
- An auditor's expert, if any, who assists the auditor in obtaining sufficient appropriate audit evidence with respect to information produced by the management's expert.

A39. Matters relevant to evaluating the competence, capabilities and objectivity of a management's expert include whether that expert's work is subject to technical performance standards or other professional or industry requirements, for example, ethical standards and other membership requirements of a professional body or industry association, accreditation standards of a licensing body, or requirements imposed by law or regulation.

A40. Other matters that may be relevant include:

- The relevance of the management's expert's competence to the matter for which that expert's work will be used, including any areas of specialty within that expert's field. For example, a particular actuary may specialize in property and casualty insurance, but have limited expertise regarding pension calculations.
- The management's expert's competence with respect to relevant accounting requirements, for example, knowledge of assumptions and methods, including models where applicable, that are consistent with the applicable financial reporting framework.
- Whether unexpected events, changes in conditions, or the audit evidence obtained from the results of audit procedures indicate that it may be necessary to reconsider the initial evaluation of the competence, capabilities and objectivity of the management's expert as the audit progresses.

A41. A broad range of circumstances may threaten objectivity, for example, self-interest threats, advocacy threats, familiarity threats, self-review threats and intimidation threats. Safeguards may reduce such threats, and may be created either by external structures (for example, the management's expert's profession, legislation or regulation), or by the management's expert's work environment (for example, quality control policies and procedures).

A42. Although safeguards cannot eliminate all threats to a management's expert's objectivity, threats such as intimidation threats may be of less significance to an expert engaged by the entity than to an expert employed by the entity, and the effectiveness of safeguards such as quality control policies and procedures may be greater. Because the threat to objectivity created by being an employee of the entity will always be present, an expert employed by the entity cannot ordinarily be regarded as being more likely to be objective than other employees of the entity.

A43. When evaluating the objectivity of an expert engaged by the entity, it may be relevant to discuss with management and that expert any interests and relationships that may create threats to the expert's objectivity, and any applicable safeguards, including any professional requirements that apply to the expert; and to evaluate whether the safeguards are adequate. Interests and relationships creating threats may include:

- Financial interests.
- Business and personal relationships.

- Provision of other services.

Obtaining an Understanding of the Work of the Management's Expert (Ref: Para. 8(b))

A44. An understanding of the work of the management's expert includes an understanding of the relevant field of expertise. An understanding of the relevant field of expertise may be obtained in conjunction with the auditor's determination of whether the auditor has the expertise to evaluate the work of the management's expert, or whether the auditor needs an auditor's expert for this purpose.²¹

A45. Aspects of the management's expert's field relevant to the auditor's understanding may include:

- Whether that expert's field has areas of specialty within it that are relevant to the audit.
- Whether any professional or other standards, and regulatory or legal requirements apply.
- What assumptions and methods are used by the management's expert, and whether they are generally accepted within that expert's field and appropriate for financial reporting purposes.
- The nature of internal and external data or information the management's expert uses.

A46. In the case of a management's expert engaged by the entity, there will ordinarily be an engagement letter or other written form of agreement between the entity and that expert. Evaluating that agreement when obtaining an understanding of the work of the management's expert may assist the auditor in determining the appropriateness of the following for the auditor's purposes:

- The nature, scope and objectives of that expert's work;
- The respective roles and responsibilities of management and that expert; and
- The nature, timing and extent of communication between management and that expert, including the form of any report to be provided by that expert.

A47. In the case of a management's expert employed by the entity, it is less likely there will be a written agreement of this kind. Inquiry of the expert and other members of management may be the most appropriate way for the auditor to obtain the necessary understanding

Evaluating the Appropriateness of the Management's Expert's Work (Ref: Para. 8(c))

A48. Considerations when evaluating the appropriateness of the management's expert's work as audit evidence for the relevant assertion may include:

- The relevance and reasonableness of that expert's findings or conclusions, their consistency with other audit evidence, and whether they have been appropriately reflected in the financial statements;
- If that expert's work involves use of significant assumptions and methods, the relevance and reasonableness of those assumptions and methods; and
- If that expert's work involves significant use of source data the relevance, completeness, and accuracy of that source data.

Information Produced by the Entity and Used for the Auditor's Purposes (Ref: Para. 9(a)–(b))

A49. In order for the auditor to obtain reliable audit evidence, information produced by the entity that is

²¹ ISA 620, paragraph 7

used for performing audit procedures needs to be sufficiently complete and accurate. For example, the effectiveness of auditing revenue by applying standard prices to records of sales volume is affected by the accuracy of the price information and the completeness and accuracy of the sales volume data. Similarly, if the auditor intends to test a population (for example, payments) for a certain characteristic (for example, authorization), the results of the test will be less reliable if the population from which items are selected for testing is not complete.

- A50. Obtaining audit evidence about the accuracy and completeness of such information may be performed concurrently with the actual audit procedure applied to the information when obtaining such audit evidence is an integral part of the audit procedure itself. In other situations, the auditor may have obtained audit evidence of the accuracy and completeness of such information by testing controls over the preparation and maintenance of the information. In some situations, however, the auditor may determine that additional audit procedures are needed.
- A51. In some cases, the auditor may intend to use information produced by the entity for other audit purposes. For example, the auditor may intend to make use of the entity's performance measures for the purpose of analytical procedures, or to make use of the entity's information produced for monitoring activities, such as reports of the internal audit function. In such cases, the appropriateness of the audit evidence obtained is affected by whether the information is sufficiently precise or detailed for the auditor's purposes. For example, performance measures used by management may not be precise enough to detect material misstatements.

Selecting Items for Testing to Obtain Audit Evidence (Ref: Para. 10)

- A52. An effective test provides appropriate audit evidence to an extent that, taken with other audit evidence obtained or to be obtained, will be sufficient for the auditor's purposes. In selecting items for testing, the auditor is required by paragraph 7 to determine the relevance and reliability of information to be used as audit evidence; the other aspect of effectiveness (sufficiency) is an important consideration in selecting items to test. The means available to the auditor for selecting items for testing are:

- (a) Selecting all items (100% examination);
- (b) Selecting specific items; and
- (c) Audit sampling.

The application of any one or combination of these means may be appropriate depending on the particular circumstances, for example, the risks of material misstatement related to the assertion being tested, and the practicality and efficiency of the different means.

Selecting All Items

- A53. The auditor may decide that it will be most appropriate to examine the entire population of items that make up a class of transactions or account balance (or a stratum within that population). 100% examination is unlikely in the case of tests of controls; however, it is more common for tests of details. 100% examination may be appropriate when, for example:
- The population constitutes a small number of large value items;
 - There is a significant risk and other means do not provide sufficient appropriate audit evidence;
- or

- The repetitive nature of a calculation or other process performed automatically by an information system makes a 100% examination cost effective.

Selecting Specific Items

A54. The auditor may decide to select specific items from a population. In making this decision, factors that may be relevant include the auditor's understanding of the entity, the assessed risks of material misstatement, and the characteristics of the population being tested. The judgmental selection of specific items is subject to non-sampling risk. Specific items selected may include:

- *High value or key items.* The auditor may decide to select specific items within a population because they are of high value, or exhibit some other characteristic, for example, items that are suspicious, unusual, particularly risk-prone or that have a history of error.
- *All items over a certain amount.* The auditor may decide to examine items whose recorded values exceed a certain amount so as to verify a large proportion of the total amount of a class of transactions or account balance.
- *Items to obtain information.* The auditor may examine items to obtain information about matters such as the nature of the entity, or the nature of transactions.

A55. While selective examination of specific items from a class of transactions or account balance will often be an efficient means of obtaining audit evidence, it does not constitute audit sampling. The results of audit procedures applied to items selected in this way cannot be projected to the entire population; accordingly, selective examination of specific items does not provide audit evidence concerning the remainder of the population.

Audit Sampling

A56. Audit sampling is designed to enable conclusions to be drawn about an entire population on the basis of testing a sample drawn from it. Audit sampling is discussed in ISA 530.²²

Inconsistency in, or Doubts over Reliability of, Audit Evidence (Ref: Para. 11)

A57. Obtaining audit evidence from different sources or of a different nature may indicate that an individual item of audit evidence is not reliable, such as when audit evidence obtained from one source is inconsistent with that obtained from another. This may be the case when, for example, responses to inquiries of management, internal audit, and others are inconsistent, or when responses to inquiries of those charged with governance made to corroborate the responses to inquiries of management are inconsistent with the response by management. ISA 230 (Redrafted) includes a specific documentation requirement if the auditor identified information that is inconsistent with the auditor's final conclusion regarding a significant matter.²³

²² ISA 530, *Audit Sampling*

²³ ISA 230, paragraph 11.

ISA 580, *Written Representations*

Appendix 1

(Ref: Para. 2)

List of ISAs Containing Requirements for Written Representations

This appendix identifies paragraphs in other ISAs that require subject-matter specific written representations. The list is not a substitute for considering the requirements and related application and other explanatory material in ISAs.

- ISA 240, The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements – paragraph 39
- ISA 250, Consideration of Laws and Regulations in an Audit of Financial Statements – paragraph 16
- ISA 450, Evaluation of Misstatements Identified during the Audit – paragraph 14
- ISA 501, Audit Evidence—Specific Considerations for Selected Items – paragraph 12
- ISA 540 (Revised), Auditing Accounting Estimates, ~~Including Fair Value Accounting Estimates~~, and Related Disclosures – paragraph 225
- ISA 550, Related Parties – paragraph 26
- ISA 560, Subsequent Events – paragraph 9
- ISA 570 (Revised), Going Concern – paragraph 16(e)
- ISA 710, Comparative Information—Corresponding Figures and Comparative Financial Statements – paragraph 9
- ISA 720 (Revised), The Auditor's Responsibilities Relating to Other Information – paragraph 13(c)

Appendix 2

(Ref: Para. A21)

Illustrative Representation Letter

The following illustrative letter includes written representations that are required by this and other ISAs in effect for audits of financial statements for periods beginning on or after December 15, 2009. It is assumed in this illustration that the applicable financial reporting framework is International Financial Reporting Standards; the requirement of ISA 570¹ to obtain a written representation is not relevant; and that there are no exceptions to the requested written representations. If there were exceptions, the representations would need to be modified to reflect the exceptions.

(Entity Letterhead)

(To Auditor)

(Date)

This representation letter is provided in connection with your audit of the financial statements of ABC Company for the year ended December 31, 20XX² for the purpose of expressing an opinion as to whether the financial statements are presented fairly, in all material respects, *(or give a true and fair view)* in accordance with International Financial Reporting Standards.

We confirm that *(, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves):*

Financial Statements

- We have fulfilled our responsibilities, as set out in the terms of the audit engagement dated [insert date], for the preparation of the financial statements in accordance with International Financial Reporting Standards; in particular the financial statements are fairly presented (or give a true and fair view) in accordance therewith.
- ~~Significant~~The methods, the significant data, and the significant assumptions used by us in making the accounting estimates, ~~including those measured at fair value, and their related disclosures are~~ appropriate to achieve recognition, measurement or disclosure that is reasonable in the context of the applicable financial reporting framework. (ISA 540 (Revised))

Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards. (ISA 550)

ISA 700 (Revised), *Forming an Opinion and Reporting on Financial Statements*

Requirements

...

Forming an Opinion on the Financial Statements

13. In particular, the auditor shall evaluate whether, in view of the requirements of the applicable financial reporting framework:

- (a) The financial statements appropriately disclose the significant accounting policies selected and applied. In making this evaluation, the auditor shall consider the relevance of the accounting policies to the entity, and whether they have been presented in an understandable manner; (Ref: Para. A4)
- (b) The accounting policies selected and applied are consistent with the applicable financial reporting framework and are appropriate;
- (c) The accounting estimates **and related disclosures** made by management are reasonable;
- (d) The information presented in the financial statements is relevant, reliable, comparable, and understandable. In making this evaluation, the auditor shall consider whether:

The information that should have been included has been included, and whether such information is appropriately classified, aggregated or disaggregated, and characterized.

The overall presentation of the financial statements has been undermined by including information that is not relevant or that obscures a proper understanding of the matters disclosed. (Ref: Para. A5)

- (e) The financial statements provide adequate disclosures to enable the intended users to understand the effect of material transactions and events on the information conveyed in the financial statements; and (Ref: Para. A6)
- (f) The terminology used in the financial statements, including the title of each financial statement, is appropriate.
