

Proposed ISA 520 (Revised), *Analytical Procedures*

[MARKED FROM AGENDA ITEMS 2–H/2–J]

This Agenda Item includes Proposed ISA 520 (Revised) marked up as follows:

- Selected paragraphs for targeted matters discussed by the Board on June 17, 2026, are shown in mark up from **Agenda Item 2–J**.
- Revisions proposed to any other requirements or application material paragraphs are shown in mark up from **Agenda Item 2–H**.

Introduction

Scope of this ISA

1. This International Standard on Auditing (ISA) deals with the auditor's use of analytical procedures as substantive procedures ("substantive analytical procedures"). It also deals with the auditor's responsibility relating to:
 - (a) The results of analytical procedures used as risk assessment procedures; and
 - (b) Performing analytical procedures near the end of the audit that assist the auditor when forming an overall conclusion on the financial statements.
2. ISA 315 (Revised 2019)¹ establishes requirements and provides guidance regarding designing and performing risk assessment procedures, ~~which~~that include analytical procedures.² Analytical procedures as risk assessment procedures are designed and performed to identify and assess risks of material misstatement, whether due to fraud or error, at the financial statement and assertion level~~s~~.
3. Proposed ISA 330 (Revised)³ establishes requirements and provides guidance regarding the nature, timing and extent of further audit procedures responsive to the assessed risks of material misstatement at the assertion level.⁴ These audit procedures may include substantive analytical procedures.⁵ Substantive analytical procedures are designed and performed to detect material misstatements at the assertion level. (~~Ref: Para. A1~~)

Effective Date

4. This ISA is effective for audits of financial statements for periods beginning on or after December 15, 20XX.

Objectives

5. The objectives of the auditor are to obtain audit evidence when using analytical procedures:

¹ ISA 315 (Revised 2019), *Identifying and Assessing the Risks of Material Misstatement*, paragraph 14(b)

² ISA 315 (Revised 2019), *Identifying and Assessing the Risks of Material Misstatement*, paragraph 14(b)

³ Proposed ISA 330 (Revised), *The Auditor's Responses to Assessed Risks*, paragraph 6

⁴ Proposed ISA 330 (Revised), *The Auditor's Responses to Assessed Risks*, paragraph 6

⁵ Proposed ISA 330 (Revised), paragraphs 7(b) and 22

- (a) As risk assessment procedures;
- (b) As substantive procedures; and
- (c) Near the end of the audit that assist the auditor when forming an overall conclusion as to whether the financial statements are consistent with the auditor's understanding of the entity.

Definitions

6. For the purposes of the ISAs, the following terms have the meaning attributed below:
- (a) Analytical procedures – A type of audit procedure that involves an evaluation of financial information through analysis of plausible relationships among financial information, non-financial information, or both. (Ref: Para. A2–A5)
 - (b) Substantive analytical procedures^s – A substantive procedure that involves a comparison of a sufficiently precise expectation developed by the auditor, based on one or more plausible and predictable relationships among financial information, non-financial information, or both, to recorded amounts (or amounts derived from recorded amounts) to detect a material misstatement.

Requirements

Results of Analytical Procedures Performed as Risk Assessment Procedures

7. ~~When~~~~if~~~~in~~ performing analytical procedures as risk assessment procedures,⁶ ~~if~~ the auditor identifies fluctuations or relationships that are inconsistent with other relevant information, or that differ from expected results, the auditor shall ~~consider~~ ~~determine~~ the effect those results have on the identification and assessment of the risks of material misstatement. (Ref: Para. A6–A7)

Substantive Analytical Procedures

8. When designing and performing substantive analytical procedures in accordance with Proposed ISA 330 (Revised),⁷ the auditor shall: (Ref: Para. A8–A9)
- (a) Determine the suitability of substantive analytical procedures in responding to assessed risks of material misstatement at the assertion level; (Ref: Para. A10–A11)
 - (b) Develop an expectation of recorded amounts ~~(or amounts derived from recorded amounts)~~ based on one or more plausible and predictable relationships among financial information, non-financial information, or both. In developing such an expectation, the auditor shall: (Ref: Para. A12–A13)
 - (i) Evaluate the reliability of information from which the auditor's expectation is developed in accordance with Proposed ISA 500 (Revised);⁸ and (Ref: Para. A14–A17)
 - (ii) Determine whether the expectation is sufficiently precise to ~~identify~~ ~~detect~~ a misstatement that, individually or when aggregated with other misstatements, may

⁶ ISA 315 (Revised 2019), paragraph 14(b)

⁷ Proposed ISA 330 (Revised), paragraphs 6–7 and 22

⁸ Proposed ISA 500 (Revised), *Audit Evidence*, paragraphs 11–13

cause the financial statements to be materially misstated. (Ref: Para. A18–A20)

- (c) Determine an amount, not exceeding performance materiality,⁹ as a basis for evaluating any difference between the expectation developed by the auditor and the recorded amounts (or amounts derived from recorded amounts) that is acceptable without further investigation of whether a misstatement exists as required by paragraph 8(d); and
- (d) If the auditor identifies a difference that exceeds the amount determined in accordance with paragraph 8(c), investigate the difference to determine whether a misstatement exists. In doing so, the auditor shall: (Ref: Para. A21–A22)
 - (i) Make inquiries of management, and as appropriate, others within or outside the entity and obtain audit evidence relevant to responses ~~of to~~ such inquiries; and (Ref: Para. A23)
 - (ii) Perform other audit procedures as necessary in the circumstances. (Ref: Para. A24)

Analytical Procedures that Assist When Forming an Overall Conclusion

- 9. The auditor shall design and perform analytical procedures near the end of the audit that assist the auditor when forming an overall conclusion as to whether the financial statements are consistent with the auditor's understanding of the entity. (Ref: Para. A25–A26)
- 10. If, in performing analytical procedures ~~that assist when forming an overall conclusion in~~ accordance with paragraph 9, the auditor identifies fluctuations or relationships that are inconsistent with other relevant information or that differ significantly from expected results, the auditor shall investigate such differences. In doing so, the auditor shall:
 - (a) Make inquiries of management, and as appropriate, others within or outside the entity and obtain audit evidence relevant to responses ~~to of~~ such inquiries; and (Ref: Para. A27)
 - (b) Perform other audit procedures as necessary in the circumstances. (Ref: Para. A28)

Application and Other Explanatory Material

Scope of this ISA (Ref: Para. 3)

- A1. ~~As explained by Proposed ISA 330 (Revised), when designing and performing further audit procedures, the auditor may design and perform analytical procedures which, in combination with tests of controls or tests of details, may provide sufficient appropriate audit evidence at the assertion level.¹⁰ Such analytical procedures are not substantive analytical procedures as contemplated by this ISA. However, the combination of, such analytical procedures and tests of details, may, for example, increase the persuasiveness of the audit evidence obtained in the circumstances.~~

Definitions of Analytical Procedures (Ref: Para. 6(a))

Analytical Procedures (Ref: Para. 6(a))

- A2. Analytical procedures include the consideration of comparisons of the entity's financial information with, for example:

⁹ ISA 320, *Materiality in Planning and Performing an Audit*, paragraphs 11 and A13

¹⁰ ~~Proposed ISA 330 (Revised), paragraph A66–~~

- Comparable information for prior periods.
 - Anticipated results of the entity, such as budgets or forecasts, or expectations of the auditor, such as an estimation of depreciation.
 - Similar industry information, such as a comparison of the entity's ratio of sales to accounts receivable with industry averages or with other entities of comparable size in the same industry.
- A3. Analytical procedures also include consideration of relationships, for example:
- Among elements of financial information that would be expected to conform to a predictable pattern based on the entity's experience, such as gross margin percentages.
 - Between financial information and relevant non-financial information, such as payroll costs and number of employees.
- A4. The application of planned analytical procedures is based on the expectation that one or more plausible relationships among information exist and continue in the absence of known conditions to the contrary. Various methods may be used to perform analytical procedures. These methods range from performing simple comparisons to performing complex analyses using advanced statistical techniques. Analytical procedures may be applied to consolidated financial statements, components and individual elements of information.
- A4A. Proposed ISA 500 (Revised) provides a non-exhaustive list of types of audit procedures and explains that analytical procedures may provide audit evidence. However, analytical procedures that are not substantive analytical procedures, when performed alone, do not provide sufficient appropriate audit evidence of the absence of a material misstatement at the assertion level.¹¹
- A5. As explained in ISA 200,¹² the application of professional skepticism by the auditor includes being alert to, for example, audit evidence that contradicts other audit evidence obtained and to information that brings into question the reliability of documents and responses to inquiries to be used as audit evidence. Designing and performing analytical procedures in an unbiased manner assists the auditor in identifying potentially contradictory information.

Results of Analytical Procedures Performed as Risk Assessment Procedures (Ref: Para. 7)

- A6. The results of analytical procedures may assist the auditor in identifying and assessing risks of material misstatement in accordance with ISA 315 (Revised 2019). For example, the auditor may:
- Identify inconsistencies, unusual transactions or events and amounts, ratios and trends that indicate matters that may have audit implications, such as risks of material misstatement, especially those due to fraud.¹³
 - Become aware of information relating to other areas of the audit where risks of material misstatement had not been previously identified, or of new information that may cause the auditor to revise the identification or assessment of risks of material misstatement.¹⁴

¹¹ [Proposed ISA 500 \(Revised\), Appendix 1](#)

¹² ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing*, paragraph A21

¹³ ISA 315 (Revised 2019), paragraph A27

¹⁴ ISA 315 (Revised 2019), paragraph 37

- Consider how the results of analytical procedures may affect the design of other risk assessment procedures.

The results of analytical procedures may also assist the ~~design of auditor in determining the nature, timing and extent of~~ further audit procedures in accordance with ISA 330.

- A7. In ~~considering~~determining the effect of the results of analytical procedures performed as risk assessment procedures, the auditor may perform additional risk assessment procedures, for example, making inquiries of management, corroborated through inspection or observation. These additional risk assessment procedures may assist the auditor in refining initial expectations of risks.¹⁵

Example:

An auditor may perform analytical procedures by comparing current year revenue to prior periods and industry trends. If revenue has increased significantly while cost of sales or receivables remain unchanged, this may indicate that a risk of material misstatement in revenue recognition exists. To refine the auditor's initial expectations of the risks of material misstatement the auditor may conduct inquiries of management to understand the reasons ~~behind for~~ the significant or unusual fluctuations, inconsistencies or differences, such as changes in pricing strategy, customer mix or billing practices.

Substantive Analytical Procedures (Ref: Para. 8)

- A8. The auditor's substantive procedures in responding to the assessed risks of material misstatement at the assertion level may include tests of details or substantive analytical procedures. The decision about which audit procedures to perform, including whether to use substantive analytical procedures, is based on the auditor's professional judgment about the expected effectiveness and efficiency of the available audit procedures to reduce audit risk at the assertion level to an acceptably low level.
- A9. Proposed ISA 330 (Revised)¹⁶ requires the auditor to respond to the risks of material misstatement in an unbiased manner. Designing and performing substantive analytical procedures to obtain audit evidence in an unbiased manner may involve, for example, avoiding using the recorded amount (or other amounts derived from the recorded amount), that is being tested when developing an expectation of recorded amounts.

Suitability of Substantive Analytical Procedures (Ref: Para. 8(a))

- A10. The auditor's determination of the suitability of substantive analytical procedures is influenced by the nature of the assertion and the auditor's assessment of the risks of material misstatement. Substantive analytical procedures are ordinarily more likely to provide sufficient appropriate audit evidence in response to assessed risks of material misstatement at the assertion level related to significant classes of transactions that consist of large volumes of transactions that are predictable over time. The application of planned substantive analytical procedures is based on the expectation that one or more plausible and predictable relationships among information exist and continue in the absence of known conditions to the contrary. However, the suitability of a

¹⁵ ISA 315 (Revised 2019), paragraph 7

¹⁶ Proposed ISA 330 (Revised), paragraph 8

particular substantive analytical procedure will depend upon the auditor's assessment of how effective it will be in detecting a misstatement that, individually or when aggregated with other misstatements, may cause the financial statements to be materially misstated.

Examples:

- In some cases, an unsophisticated predictive model may be effective as a substantive analytical procedure. This may be the case where an entity has a known number of employees at fixed rates of pay throughout the period. In such circumstances, it may be possible for the auditor to use this information to ~~predict~~estimate the total payroll costs for the period with a high degree of accuracy, thereby providing audit evidence for a significant class of transactions ~~account balance~~ in the financial statements.
- A substantive analytical procedure involving the prediction of total rental income on a building divided into apartments, taking the rental rates, the number of apartments and vacancy rates into consideration, may provide persuasive audit evidence, provided the information used to develop an expectation is evaluated as reliable.

Considerations Specific to Public Sector Entities

A11. The relationships between individual financial statement items traditionally considered in the audit of business entities may not always be relevant in the audit of governments or related governmental entities and other non-~~for-profit business~~-public sector ~~organizations~~entities. For example, in many public sector entities there may be little direct relationship between revenue and expenditure. Also, industry data or statistics for comparative purposes may not be available in the public sector. However, relationships may exist between revenue or expenditure and other financial or non-financial information. For example, in government~~al~~ entities, there may be a relationship among road repairs and maintenance expenses and the cost of materials used (e.g., asphalt and concrete, and kilometers of road paved).

Identifying a Plausible and Predictable Relationship (Ref: Para. 8(b))

A12. When determining whether a relationship is sufficiently plausible and predictable, the auditor may consider information obtained from the auditor's understanding of the entity and its environment, and other procedures performed to comply with the ISAs, which may provide information related to matters such as business changes, unusual transactions, general economic conditions and industry factors.

A13. Factors that may affect the plausibility and predictability of the relationship may include:

- The nature of the financial and non-financial information (e.g., in certain circumstances, there may be a predictable relationship between payroll expense and number of employees headcount).
- ~~The industry in which the entity operates (e.g., in certain industries, a relationship among financial information, non-financial information, or both financial and non-financial information, may be more plausible or predictable than in other industries).~~
- Stability and consistency over time (e.g., relationships that have remained stable or consistent in prior periods may be more predictable over time).
- Cyclicity or seasonality (e.g., recurring cycles or seasonal trends may make ~~at the~~

relationship more predictable).

- Complexity of the relationship (e.g., relationships affected by multiple variables may be more difficult to predict).

The plausibility and predictability of a relationship may change due to circumstances such as changes in regulatory, economic or operating environment, new business models, products or activities.

Example:

As a result of business disruptions to an entity's operations in the current period (e.g., suspended production and product deliveries that are significantly delayed) ~~during the current period~~, the relationship between actual sales revenue and budgeted sales revenue may no longer be plausible.

Reliability of Information (Ref: Para. 8(b)(i))

A14. Proposed ISA 500 (Revised)¹⁷ establishes requirements and provides guidance for evaluating whether the information intended to be used as audit evidence is reliable,⁴⁸ which includes evaluating the reliability of the information from which the auditor's expectation is developed. In making this evaluation, the auditor is required to consider:

- The source of the information (e.g., information from ~~certain~~ external sources may be less susceptible to management bias when it is less likely for management to influence such information source).
- The attributes of reliability of information that are of significance in the circumstances to meet the intended purpose of the substantive analytical procedure, including, if the information is information produced by the entity, to evaluate, to the extent necessary, the ~~from sources internal to the entity, to obtain audit evidence about the~~ accuracy and completeness of such information, ~~as necessary in the circumstances.~~

A15. In evaluating the reliability of information from which the auditor's expectation is developed, the auditor may also consider matters such as:

- Comparability of the information (e.g., broad industry data may need to be supplemented to be comparable to that of an entity that produces and sells specialized products).
- Form, ~~and~~ availability, accessibility and understandability of the information (e.g., whether budgets have been established as results to be expected rather than as goals to be achieved).
- Controls addressing the preparation of the information that are designed to ensure its completeness, accuracy and validity (e.g., controls over the preparation, review and maintenance of budgets).

Such matters may be relevant irrespective of whether the auditor performs substantive analytical procedures on the entity's period-end financial statements, or at an interim date and plans to perform substantive analytical procedures for the remaining period. Proposed ISA 330 (Revised)

¹⁷ Proposed ISA 500 (Revised), paragraphs 11–13

⁴⁸ Proposed ISA 500 (Revised), paragraphs 11–13

establishes requirements and provides guidance on substantive procedures performed at an interim date.¹⁹

- A16. The auditor may evaluate the reliability of the information used in performing substantive analytical procedures by consider testing the operating effectiveness of controls addressing the entity's preparation of information, used by the auditor in performing substantive analytical procedures to evaluate the reliability of such information. The auditor may test the operating effectiveness of controls that address the reliability of non-financial information in conjunction with tests of controls that address the reliability of financial information.

Example:

In establishing controls over the processing of sales invoices, an entity may include controls over the recording of unit pricessales. In these circumstances, the auditor may test the operating effectiveness of controls over the recording of unit pricessales in conjunction with tests of the operating effectiveness of controls over the processing of sales invoices. Alternatively, the auditor may consider whether the information was subjected to other procedures to evaluate the reliability of such information.

- A17. The auditor may inquire of management as to the availability and reliability of information needed to develop the auditor's expectation for use in the substantive analytical procedures, and the results of any analytical or similar procedures performed by the entity. It may be effective to use analytical information prepared by management, provided the auditor is satisfied that such information is evaluated as reliable.

Determining Whether the Expectation Is Sufficiently Precise (Ref: Para. 8(b)(ii))

- A18. Proposed ISA 500 (Revised) establishes requirements and guidance for evaluating whether the information intended to be used as audit evidence is relevant and sets out factors that may affect the relevance of such information.²⁰ For a substantive analytical procedure, the level of detail of the information needed to meet the intended purpose of the audit procedure is a necessary consideration when developing a sufficiently precise expectation of recorded amounts or amounts derived from recorded amounts. As required by paragraph 8(b), a sufficiently precise expectation is based on identifying one or more plausible and predictable relationships among financial information, non-financial information or both, with such relationships expected to continue in the absence of known conditions to the contrary.

- A19. Matters that may be relevant to the auditor's determination in accordance with paragraph 8(b)(ii) may include:

- The accuracy with which the expected results of substantive analytical procedures can be predicted.

Example:

The auditor may be able to develop a sufficiently precise expectation of the amount of the entity's interest expense for the period, based on the relationship between the principal amount of the entity's borrowing facility and applicable interest rates during the period.

¹⁹ Proposed ISA 330 (Revised), paragraphs 25–26

²⁰ Proposed ISA 500 (Revised), paragraphs 11 and A39–A40

- The degree to which information can be disaggregated.

Example:

Substantive analytical procedures may be more effective when applied to financial information on individual sections of an operation or to financial information statements of components of a diversified entity, than when applied to financial statements at an aggregated level for the entity as a whole.

- The availability of information on which to base an expectation, as well as how external factors may affect such information. If the information is available, the auditor is required to evaluate the reliability of the information in accordance with paragraph 8(b)(i).

Examples:

The auditor may consider whether:

- Financial information, such as budgets or forecasts, and non-financial information, such as the number of units produced or sold, is available to design substantive analytical procedures.
- External factors, such as general economic conditions, changes in interest rates or industry trends affect financial or non-financial information.

- A20. The auditor may use technological tools when designing and performing substantive analytical procedures to assist in developing an expectation that is more precise.

Examples:

The auditor may use technological tools to analyze:

- Unstructured data from industry reports obtained directly by the auditor from external sources. By transforming the data into structured information and analyzing factors such as market growth rates, competitor performance and pricing trends, the auditor may develop a more precise expectation about the entity's performance or financial results relative to industry wide trends or conditions.
- The entity's historical monthly revenue and cost of sales information and identify a predictable relationship between revenue and cost of sales. By incorporating variables, such as seasonal trends, changes in pricing and volumes of goods sold, the technological tool may enable the auditor to develop a more precise expectation of the current period's cost of sales relative to revenue.

Investigating Results of Substantive Analytical Procedures (Ref: Para. 8(d))

- A21. When the auditor is satisfied that the expectation of recorded amounts (or amounts derived from recorded amounts) is appropriate, a difference exceeding the amount that is acceptable without further investigation ordinarily indicates a misstatement. ISA 450²¹ requires the auditor to consider both the size and the nature of a misstatement, and the particular circumstances of its

²¹ ISA 450, *Evaluation of Misstatements Identified during the Audit*, paragraph 11(a)

occurrence, when evaluating whether the misstatement is material.²² ISA 450 also provides guidance on the circumstances that may affect the evaluation of a misstatement.²³

- A22. When investigating a difference, the auditor may obtain new information of which the auditor was not aware when developing the auditor's expectation of the recorded amounts (or amounts derived from recorded amounts). In such circumstances, the auditor may revise the identification or assessment of the risks of material misstatement,²⁴ modify the design of the substantive analytical procedures or perform other substantive procedures to determine whether there is a misstatement.
- A23. Proposed ISA 500 (Revised) explains that inquiry alone ~~ordinarily~~ does not provide sufficient appropriate audit evidence of the absence of a material misstatement at the assertion level.²⁵ Accordingly, the auditor is required by paragraph 8(d)(i) to obtain audit evidence relevant to the responses to inquiries made of management, and as appropriate, others within and outside the entity to respond to an assessed risk of material misstatement.

Example:

In testing an entity's product sales, the auditor may develop an expectation based on quantity of products sold and the unit price.~~7~~ In doing so, the auditor may~~and~~ identify a difference from the recorded amount that exceeds the amount acceptable without further investigation. To investigate the difference, the auditor makes inquiries of management regarding the reasons for the difference, and inspects supporting documents, such as delivery reports provided by a third-party shipping company to corroborate the explanations provided by management~~compare quantities of products delivered with quantities of products sold used in developing the auditor's expectation of the recorded amount.~~

- A24. The need to perform other audit procedures may arise when, for example, management is unable to provide an explanation, or the explanation, together with the audit evidence obtained relevant to management's response, is not considered adequate.

Analytical Procedures that Assist When Forming an Overall Conclusion

Designing and Performing Analytical Procedures that Assist When Forming an Overall Conclusion (Ref: Para. 9)

- A25. The conclusions drawn from the results of analytical procedures designed and performed in accordance with paragraph 96 are intended to corroborate conclusions formed during the audit of individual components or elements of the financial statements. This assists the auditor to draw reasonable conclusions on which to base the auditor's opinion.
- A26. The analytical procedures performed in accordance with paragraph 9 may be similar to those that would be used as risk assessment procedures.

²² ~~ISA 450, Evaluation of Misstatements Identified during the Audit, paragraph 11(a)~~

²³ ISA 450, paragraph A21

²⁴ ISA 315 (Revised 2019), paragraph 37

²⁵ Proposed ISA 500 (Revised), ~~paragraphs 13–16 in~~ Appendix 1, paragraphs 13–16.

Investigating Results of Analytical Procedures that Assist When Forming an Overall Conclusion (Ref: Para. 10)

A27. In obtaining audit evidence relevant to the responses to inquiries made of management, and as appropriate, others within or outside the entity, the auditor may evaluate the consistency of such responses with:

- The auditor's understanding of the entity and its environment (e.g., general economic conditions, industry factors and the entity's history);
- Other audit evidence obtained during the course of the audit, or
- The auditor's prior experience on the audit or similar engagements.

A28. In the case of analytical procedures performed near the end of the audit that assist the auditor when forming an overall conclusion, the need to perform other audit procedures may arise when, for example, management responses are inconsistent with the auditor's knowledge obtained in the audit or when the results of the audit procedures performed in accordance with paragraph 10(a) are not considered adequate. The results of such analytical procedures, together with management's responses to the auditor's inquiries, may also identify a previously unrecognized risk of material misstatement. In such circumstances, the auditor is required to revise the assessment of the risks of material misstatement in accordance with ISA 315 (Revised 2019) and modify the planned further audit procedures accordingly.²⁶

²⁶ ISA 315 (Revised 2019), paragraph 37