

Technology Quality Management Workstream

Development of the Guide Series on AI-Enabled Technological Tools

Objective of the September 2026 IAASB Discussion

The objective of the September 2026 IAASB discussion is to obtain Board input on the continued development of the non-authoritative guide series on applying the IAASB's quality management standards to AI-enabled technological tools.

The two guides presented at this meeting are at different stages of development.

Proposed Guide 1, Common Conceptual Foundation (see [Agenda Item 2-A](#)), is presented for a section-by-section review. Subject to input from the Technology Quality Management Expert Group (Expert Group) at its September 9, 2026 meeting and from the Board at its September 14–17, 2026 meeting, staff intends to further refine Guide 1 and bring a final proposed version to the Board for approval at the October 28, 2026 mid-quarter meeting.

Working Draft Guide 2, Firm-Level Quality Management Before Deployment (see [Agenda Item 2-B](#)), is at an earlier stage of development and is being presented for initial discussion and directional input. The discussion is intended to help staff and the Expert Group assess whether the guide is developing in the right direction and identify matters that should be further developed or reconsidered as the draft advances toward planned approval at the December 2026 Board meeting.

The drafts of **Guides 1 and 2** will also be considered by the Expert Group at its September 9, 2026 meeting. As in June, the close proximity of the Expert Group and Board meetings allows both groups to consider the same developing material, with their respective perspectives informing the next stage of development.

Organization of this Paper

1. This paper is organized as follows:
 - I. [Development Since June and Revised Roadmap](#)
 - II. [Expert Group, TCG, TAN and IESBA Coordination](#)
 - III. [Proposed Guide 1 - Common Conceptual Foundation](#)
 - IV. [Working Draft Guide 2 - Firm-Level Quality Management Before Deployment](#)
 - V. [Approach to the September Discussion and Next Steps](#)

I. Development Since June and Revised Roadmap

2. At its June 2026 meeting, the Board considered a proposed five-guide roadmap and a rolling approach to Board consideration. The June paper ([Agenda Item 7](#)) also noted that the roadmap would continue to be refined as development progressed. Based on input received at the June meetings of the Board and the Expert Group, and on subsequent drafting experience, staff have refined the roadmap in several respects.

Four-Guide Series

3. First, the guide series is now structured as four guides rather than five. The separate guide on deploying and enabling use of approved tools has been removed. Enablement has been incorporated into **Guide 2** because the relevant firm-level policies or procedures, methodology, training, communications, access controls and approval conditions are responses that are closely connected to the firm's pre-deployment evaluation and decision about whether and how a tool may be made available. **Guide 3** now addresses engagement-level use and oversight, and **Guide 4** addresses post-deployment monitoring, change, revalidation, remediation and decommissioning.

Guide 2 Presented as One Integrated Guide

4. Second, **Guide 2** is being developed and presented as one integrated guide rather than in two parts. The June roadmap contemplated that service-provider and foundational-model considerations could be brought to the Board separately from firm development, configuration and assembly considerations. Expert Group input indicated that this split was too artificial and could create unnecessary duplication because quality management processes may overlap across service-provider-developed, network-developed, firm-developed and firm-configured tools. In practice, a single AI-enabled technological tool may also contain elements that are developed, provided or controlled through different arrangements. Presenting the full Guide 2 at this meeting allows the Board to engage with the guide's overall architecture and the interaction among those matters before the guide is expected to be tabled for approval in December 2026.

Broader Focus on AI-enabled Technological Tools

5. Third, the scope of the guide series has been broadened from Gen AI-enabled technological tools to AI-enabled technological tools. As drafting progressed and staff continued its technical outreach, concerns emerged that focusing the series on a particular class of AI could unnecessarily limit its relevance and cause the guidance to become dated as AI technologies and architectures continue to evolve. In particular, Gen AI represents one class of AI, and emerging tools with increasingly autonomous or agentic capabilities may not always fit neatly within that classification. The Expert Group discussed this broader framing at its August 12, 2026 meeting and supported the change.
6. The guide series therefore focuses on AI-enabled technological tools and, within that scope, on the functionality made available, the tool's intended use or category of use, and relevant AI characteristics rather than drawing rigid boundaries among types of AI. Gen AI, agentic AI, machine learning and other forms of AI may fall within the scope where they enable a technological tool addressed by the guide series. This change is intended to make the guidance more durable as the underlying AI technologies continue to evolve.

Revised Guide Series Roadmap and Planned Board Consideration

7. **Table 1** summarizes the combined effect of the matters addressed above on the timeline in terms of sequencing and rolling Board consideration of the guides. This represents a revision of the table that was presented at the June 2026 meeting (Table 5 in [Agenda Item 7](#)) and reflects additional flexibility in terms of providing that the Board considers each guide at least twice before approval

Table 1: Revised Guide Series Roadmap and Planned Board Consideration

Guide	Primary Focus	Planned Board Consideration and Approval ¹
GUIDE 1 Common Conceptual Foundation	Common scope and terminology; why focused guidance may be needed; quality management life cycle; foundation in ISQM 1 ² and ISA 220 (Revised); ³ application of the firm's risk assessment process; scalability and proportionality; glossary.	September 2026: <i>Proposed</i> Guide 1 for section-by-section Board comment. October 28, 2026: 2 nd discussion and targeted approval.
GUIDE 2 Firm-Level Quality Management Before Deployment	Applies the Guide 1 foundation before deployment, including pre-deployment design, evaluation and enablement across selected components of a firm's system of quality management (SOQM).	September 2026: <i>Working Draft</i> for initial discussion and directional input. December 2026: 2 nd discussion and targeted approval.
GUIDE 3 Engagement-Level Use and Oversight	Engagement-level application of firm policies or procedures and relevant engagement standards, including direction, supervision and review, evaluation of outputs or actions, human involvement and feedback to the firm.	December 2026: draft for initial discussion and directional input. March 2027: 2 nd discussion and targeted approval.
GUIDE 4 Post-Deployment Monitoring, Change, Revalidation, Remediation and Decommissioning	How information arising after deployment feeds back into the firm's quality management processes, including monitoring, changes, revalidation, remediation, restrictions and decommissioning.	March 2027: draft for initial discussion and directional input. June 2027: 2 nd discussion and targeted approval.
Integrated Guide Series	Final integration of the guide series, including cross-references and any conforming and consequential amendments needed to earlier-approved guides.	June 2027: Board consideration of final conforming and consequential amendments and completion of the integrated guide series for publication.

8. The revised sequencing retains the rolling approach discussed in June: material is brought to the Board when it is sufficiently developed for meaningful input or approval, while drafting of the interdependent guides continues in parallel. The June 2027 meeting is intended to complete the series, including approval of Guide 4 and any conforming and consequential amendments needed to

¹ As individual guides are approved, they will be published on the IAASB's [Technology Quality Management Workstream webpage](#) following Board approval.

² International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*

³ International Standard on Auditing (ISA) 220 (Revised), *Quality Management for an Audit of Financial Statements*

previously approved guides so that the full guide series can operate as a coherent integrated package.

Matter for IAASB Consideration

1. Do Board members support the revised four-guide roadmap, including the broader focus on AI-enabled technological tools, and the planned sequencing of Board input and approvals through June 2027?

II. Expert Group, TCG,⁴ TAN⁵ and IESBA⁶ Coordination

9. The Expert Group continues to meet on a monthly cadence to support development of the guide series. Information about the composition of the Expert Group and its Terms of Reference is available on the Technology Quality Management Workstream [project page](#). During the quarter, the Expert Group met on July 8, 2026 and August 12, 2026, and will meet again on September 9, 2026, shortly after the September Board materials are posted. These meetings have been used to test developing concepts and draft material. Between meetings, staff and the relevant drafting teams, comprising subgroups of Expert Group members, continue to revise and advance the guides in response to the input received.
10. On August 18, 2026, staff met with the TCG to obtain input on the versions of **Guide 1** and **Guide 2** that had been considered by the Expert Group on August 12. The discussion provided an additional technology-focused perspective on the developing guides before their further refinement for the September Board meeting.
11. On August 26, 2026, staff also discussed those same drafts with the TAN. The TAN comprises representatives from the IAASB Jurisdictional Auditing and Assurance Standard Setters (JSS) Liaison Group and is the principal mechanism through which the Workstream obtains input from jurisdictional standard setters on the Tech QM guidance.

Coordination with IESBA

12. Coordination with the IESBA is embedded in these consultation arrangements. A member of the IESBA staff team who leads IESBA's technology initiatives attends the Tech QM Expert Group meetings as an observer and also attends meetings of the TCG and TAN. This provides a regular mechanism to identify ethics and independence matters relevant to the guide series, coordinate the development of technology-related non-authoritative material, and avoid unnecessary duplication or inconsistency between the IAASB's and IESBA's work.
13. IAASB staff also received specific input from IESBA staff on **Guide 1** on linking the IAASB's work with that of IESBA and emphasizing coordination between the Boards, which has been incorporated

⁴ The Technology Consultation Group (TCG) provides input and support to project teams, working groups, or staff, as needed, on the effect of technology on other IAASB projects or activities. Please visit the IAASB's [Technology Position Initiative webpage](#) for information on the composition of the TCG.

⁵ The Technology Advisory Network (TAN) supports the IAASB's efforts to monitor and adapt to emerging technologies that may impact the relevance and effectiveness of the Technology Position and standards. Please visit the IAASB's [Technology Position Initiative webpage](#) for information on the composition of the TAN.

⁶ International Ethics Standards Board for Accountants (IESBA).

in the draft of **Guide 1** in [Agenda Item 2-A](#). IAASB staff plans to coordinate closely with IESBA in Q4 2026 regarding the relevant ethical requirements section in **Guide 2**.

III. Proposed Guide 1 - Common Conceptual Foundation

14. **Proposed Guide 1** has progressed from the proposed overarching framework discussed in June to a proposed version of the Common Conceptual Foundation for the guide series. It establishes the common scope and terminology for the series, explains why AI-enabled technological tools may warrant focused quality management guidance, introduces the quality management life cycle used to organize **Guides 2 to 4**, explains the relationship between firm-level and engagement-level quality management, and applies the firm's ISQM 1 risk assessment process. It also addresses scalability and proportionality and includes a glossary to support consistent terminology across the series.
15. A central drafting objective has been to anchor the guide directly in ISQM 1 and ISA 220 (Revised) and to avoid creating a separate AI governance or implementation framework. **Guide 1** introduces six considerations, framed as a series of questions, that may help a firm understand circumstances relevant to identifying and assessing quality risks when considering an AI-enabled technological tool. The guide also introduces the concept of a quality management life cycle to act as a navigation structure for the guide series, not a prescribed tool-development or quality management process.
16. **Proposed Guide 1** is not being presented for approval at the September meeting. The Board will be asked to walk through the guide in its entirety and comment on each section. Subject to comments from the Expert Group on September 9 and from the Board at its September 14-17 meeting, staff intends to prepare a final proposed version for approval at the October 28, 2026 mid-quarter Board meeting. Given the stage of development, Board members are encouraged to identify any concepts or drafting that they believe should change before the guide is brought forward for approval.

Matter for IAASB Consideration

2. Board members are asked to share their views on **Proposed Guide 1**, including any suggestions or matters that staff should consider in finalizing a proposed version for approval on October 28, 2026.

IV. Working Draft Guide 2 - Firm-Level Quality Management Before Deployment

17. **Guide 2** is at an earlier stage of development than **Guide 1** and remains a working draft. It builds on the common conceptual foundation in **Guide 1** and applies that foundation to firm-level quality management before an AI-enabled technological tool, particular functionality or category of use is made available for engagement use. Its focus is pre-deployment design, evaluation and enablement.
18. The draft is organized around the firm's risk assessment process and selected components of the SOQM for which focused pre-deployment guidance may be useful. It begins with Resources and then considers Governance and Leadership, Engagement Performance, Information and Communication, Relevant Ethical Requirements, and Preparing for Monitoring and Remediation. The ordering is for navigation and does not imply a hierarchy among the components, which remain interconnected.
19. The draft also reflects the Expert Group's view that service-provider and firm-developed or firm-configured tools should not be addressed through separate tracks. It focuses instead on the relevant elements of the tool and the arrangements through which those elements are developed, provided or controlled. Evaluation may draw on work performed by the firm or its network, information from

service providers, independent assurance or certification, testing and pilot experience. This approach is intended to recognize that modern AI-enabled tools may combine multiple elements and arrangements within the same technological environment.

20. **Guide 2** uses external frameworks and guidance as sources of practical insight, while translating those insights back to ISQM 1. The working draft generally proceeds from the relevant ISQM 1 principle or quality objective, through illustrative quality risks and external insights, to possible responses. The examples and possible responses are not intended to create new requirements or prescribe a separate AI governance framework. The draft also integrates enablement into the pre-deployment discussion through matters such as methodology, training, communications, technical configuration and approval conditions.
21. Because **Guide 2** is still a working draft, staff does not propose a line-by-line review at the September meeting. Instead, Board input is sought on the overall direction and architecture of the guide so that staff and the Expert Group can continue to develop the draft toward planned approval in December 2026. That said, all feedback from the Board is welcome.

Matters for IAASB Consideration

3. Board members are asked to share their views on the *working draft* of **Guide 2**, with a focus on directional input. In addition:
 - a) Does **Guide 2** appropriately build on **Guide 1** while remaining grounded in ISQM 1?
 - b) Is the structure around selected SOQM components, illustrative quality risks, external insights and possible responses an effective way to provide practical non-authoritative material without creating new requirements or a separate AI governance framework?
 - c) Are there areas where the balance, depth or emphasis should change, or any other matters that staff should consider in updating **Guide 2** for Board consideration and approval in December 2026?

V. Next Steps

22. Following the September Expert Group and Board discussions, staff will consider the input from both groups together. **Guide 1** will be further refined for targeted approval at the October 28, 2026 mid-quarter Board meeting, while staff and the Expert Group will continue to advance Guide 2 toward targeted approval in December 2026. Development of **Guides 3 and 4** will continue in parallel in accordance with the roadmap in **Table 1**. Consultation with the Expert Group will continue through its monthly meeting cadence, supplemented by TCG and TAN input, as appropriate, and ongoing coordination with IESBA.

Appendix 1

Technology Team Members and Activities

Technology Team Members

1. In addition to the following IAASB technical staff and IAASB staff fellows, the Technology Team includes Megan Leicht (IAASB Project Manager):
 - Angelo Giardina
 - Fadi Mansour
 - Ida Diu
 - Isabelle Raiche
 - Sachiko Kai (Staff Fellow)

Project Board Members

2. The IAASB Project Board Members are:
 - Edo Kienhuis
 - Nancy Cheng

Expert Group

3. Information about the composition of the Expert Group and its Terms of Reference is available on the Technology Quality Management Workstream [project page](#)

Activities During Q3 2026

4. Refer to [Section II](#) of this paper for information about activities undertaken during the quarter.