

EXPOSURE DRAFT OF PROPOSED ISRE 2410 (REVISED), REVIEW OF INTERIM FINANCIAL INFORMATION PERFORMED BY THE INDEPENDENT AUDITOR OF THE ENTITY'S ANNUAL FINANCIAL STATEMENTS

Response Form

Guide for Respondents

Comments are requested by **September 3, 2026**. *Note that requests for extensions of time cannot be accommodated due to the timeline for finalization of this proposed revised standard.*

This form is for providing comments on the Exposure Draft of proposed International Standard on Review Engagements™ (ISRE) 2410, *Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements* (ED-2410), in response to the questions set out in the Explanatory Memorandum (EM) to ED-2410. It also allows for respondent details, demographics and other comments to be provided. Use of this form will facilitate the IAASB's analysis of the responses.

You may respond to all questions or only those questions for which you have specific comments.

To assist our consideration and analysis of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Include any detailed comments below that, as indicated.
- When providing comments, respond directly to the questions and:
 - Provide the rationale for your answers. If you disagree with the proposals in ED-2410, please provide specific reasons for your disagreement and include specific suggestions for changes (including specific wording) that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view as support for the IAASB's proposals cannot always be inferred when not stated.
 - Be specific about the sections, headings or paragraphs in ED-2410 to which your responses relate.
 - Refrain from inserting tables or text boxes in your responses.

It is not necessary to include a cover letter containing a summary of your key issues. The response form provides the opportunity to include any other views you wish to place on the public record, should you choose to do so. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the **"Submit Comment"** button on [the web page for proposed ISRE 2410 \(Revised\)](#) to upload the completed form.

Responses to IAASB's Request for Comments in the EM for ED-2410, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements

PART A: Respondent Details and Demographic information

Your organization's name (or your name if you are making a submission in your personal capacity)	INTOSAI
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	
Geographical profile that best represents your situation (i.e., the geographical perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	<u>Global</u>
	If "Other", please clarify
The stakeholder group to which you belong (i.e., the perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	<u>Public sector organization</u>
	If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB's preference is that you incorporate all your views in your comments to the questions (also, Question 16 in Part B allows for raising any other matters in relation to ED-2410).

Information, if any, not already included in responding to the questions in Part B:

Click or tap here to enter text.

PART B: Responses to Questions in the EM for ED-2410

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

Overall Impact

1. Do you agree that ED-2410 is **responsive to the public interest**, considering the qualitative standard-setting characteristics and the standard-setting actions in the project proposal?
(See Section I-A and the Appendix in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

2. Do you agree that ED-2410 strikes **an appropriate balance** between the work effort required to express a limited assurance conclusion on the interim review engagement, and more robust requirements in the public interest in certain areas (e.g., going concern, fraud and non-compliance with laws and regulations)? You are invited to include as part of your response insights on **the implications or effects** of implementing the proposed standard.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

Professional Skepticism and Professional Judgment

3. Does ED-2410 appropriately address the foundational concepts of professional skepticism and professional judgment, and the importance of applying these concepts throughout the interim review engagement? If not, what more might be needed in this regard?
(See Section I-B, paragraph 22(a) in the EM)

Overall response: **Yes, with comments below**

Detailed comments (if any):

We support reinforcing the concepts of professional skepticism and professional judgment. We recommend clarifying that these concepts are applied proportionately in a limited assurance engagement and that references to ISAs are intended to support consistent application rather than extend the scope of an interim review engagement.

Consider defining these concepts in the context of an interim review, either in this standard or in the IAASB Glossary of Terms.

Fundamental Principles of an Interim Review Engagement

4. Does the Introduction section of ED-2410 provide a clear description of the nature and purpose of an interim review engagement, and how it differs from an audit of financial statements, to provide foundational context for the work effort needed to achieve the objective of the engagement?

(See Section I-B in the EM)

Overall response: **Yes, with comments below**

Detailed comments (if any):

Our members held differing views on the inclusion of an explanatory paragraph describing how an interim review differs from an audit of financial statements. On the one hand, there was support for retaining the paragraph while providing a concise explanation in the review report to help reduce the users' expectation gap. On the other hand, some members were of the view that including such an explanatory paragraph directly in ED-2410 appears to be inconsistent with the structure and drafting approach of other IAASB standards, which generally do not include explanatory material of this nature. A suggestion was made to consider placing this explanation elsewhere, for example, in the IAASB Glossary of Terms, where the concept of limited assurance is explained.

5. Is ED-2410 sufficiently clear that while the auditor performs primarily inquiries and analytical procedures, *all procedures* performed for the purpose of achieving the overall objective of the interim review engagement are "review procedures"? If not, what suggestions do you have to make this clearer?

(See Section I-F, paras. 44-47 in the EM)

Overall response: **No, with comments below**

Detailed comments (if any):

We recommend further clarifying the distinction between:

- **Primary review procedures**, consisting primarily of inquiries and analytical procedures, as defined in paragraph 13(i);
- **Other review procedures** performed as part of the planned review procedures in accordance with paragraph 44; and
- **Additional procedures** performed under paragraph 70 when a matter comes to the auditor's attention that causes the auditor to believe that the interim financial information may be materially misstated.

Clarifying these distinctions would help avoid an interpretation that additional procedures are required in all interim review engagements.

Our members also suggested clarifying whether the auditor may perform **additional procedures** whenever considered necessary to achieve the objective of the review engagement, rather than only after identifying indications that the interim financial information may be materially misstated.

Approaching an Interim Review Engagement in Accordance with ED-2410

6. Is it sufficiently clear that, for recurring engagements, the auditor leverages the knowledge and understanding obtained from previous annual audits and interim review engagements for the entity? If not, what suggestions do you have to make this clearer?

(See Section I-B and Section I-F, paragraphs 44-52 in the EM)

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

N/A

7. Do you agree with the considerations that apply when the review of interim financial information is the first engagement performed for the audit client? If not, what suggestions do you have for additional considerations related to first-time interim review engagements?

(See Section I-F, paras. 48-52 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

Materiality

8. Do you agree with the requirement for the auditor to determine materiality for the interim review engagement, and the related application material that describes the relevant principles that apply? If not, what would you suggest?

(See Section I-F, paragraphs 41-43 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

In summary, we recommend clarifying the meaning of "**other factors**" and the basis for determining materiality to promote the consistent application of the proposed requirements. We provide the following detailed comments in support of our recommendation:

- a) The last sentence in paragraph A68 states: "In an interim review engagement, the auditor may decide to use the same benchmark and an appropriate percentage as a starting point in determining a quantitative materiality for the interim financial information as a whole, or may consider other factors." The phrase "may consider other factors" lacks clarity, as it is not clear what those other factors may be or how they are expected to influence the determination of materiality for the interim financial information.
- b) In paragraph A70, given that the interim financial information of components is consolidated for purposes of group interim financial reporting, this paragraph should clearly address the concept of a "clearly trivial threshold." Insofar as communicating misstatements to the group auditor is concerned.

- c) No guidance is provided regarding the type of financial information that the auditor may use when determining materiality, for example, whether materiality should be based on current-period interim financial information, annualized results, prior-year audited financial information, etc.
- d) It is unclear whether the concept of specific materiality is permitted or contemplated in the context of an interim review engagement. Consideration should be given to clarifying this matter within the standard or the application material.

Group Interim Review Engagements

9. Overall, do you agree that ED-2410 is capable of being applied for the review of interim financial information of groups? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed.

(See Section I-F, paragraphs 37-40 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

We recommend clarifying the applicable review standard when a component auditor is involved in a group interim review engagement, particularly where the component auditor is not the statutory auditor of the component. For example, if the component auditor is not the independent auditor of the component's annual financial statements, would it be appropriate for the component auditor to apply this standard when reviewing the component's interim financial information for the purposes of the group interim review, or would the component auditor be required to apply ISRE 2400?

Furthermore, if ISRE 2400 is applied at the component level, clarification is needed on whether it would still be appropriate for the group interim review conclusion to state that the review was performed in accordance with ISRE 2410.

10. Are the requirements in ED-2410 that address specific considerations related to group interim review engagements appropriate? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed.

(See Section I-F, paragraphs 37-40 in the EM)

Overall response: **Yes, with comments below**

Detailed comments (if any):

We consider the proposed requirements to be sufficiently clear. However, our members raised the following question for the IAASB's consideration:

Ref. paragraphs A64-A65: Is it the IAASB's intention that the determination of components relevant to the group interim review should not apply in the context of the interim review standard?

Fraud and Non-Compliance with Laws and Regulations (NOCLAR)

11. Do you agree that the work effort requirements related to fraud and NOCLAR are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to fraud and NOCLAR in the context of that engagement? If not, please explain your reasons, and provide suggestions for the auditor's approach to fraud and NOCLAR in an interim review engagement.

(See Section I-F, paras. 54-56 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

We recommend including application material clarifying that, in the public sector, the reporting responsibilities of the public sector auditor regarding fraud, corruption, and non-compliance with laws and regulations may extend beyond assessing their effect on the interim financial information, in accordance with their constitutional or legislative mandate.

Going Concern

Questions 12 and 13 below address both the auditor's work effort related to going concern in an interim review engagement and transparency about going concern in the interim review report.

12. Do you agree that the work effort requirements related to going concern are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to going concern in the context of that engagement? If not, please explain your reasons and provide suggestions for how ED-2410 should address the auditor's responsibilities related to going concern in an interim review engagement.

(See Section I-F, paras. 57-61 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

13. Do you agree with the proposals to introduce a new separate section relating to going concern in the auditor's interim review report? If not, please explain your reasons and provide suggestions for how ED-2410 should address transparency about going concern in the interim review report.

(See Section I-H, paragraphs 74-79 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

In particular:

- (a) Do you agree with the proposed required statements, appropriately worded for a limited assurance engagement, relating to the going concern basis of accounting and whether a material uncertainty exists? If not, please explain your reasons and provide suggestions for how such statements should be worded in the interim review report.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

- (b) Do you agree that the circumstances addressed in the requirements in paragraphs 108-111 of ED-2410 capture the most frequently encountered scenarios in practice? If not, please explain your reasons and provide suggestions for any other scenarios that should be addressed in ED-2410.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

- (c) Do you agree with the requirement in paragraph 111 of ED-2410 to include a reference in the interim review report to disclosure(s) of a going concern matter, other than a material uncertainty (for example, a “close call”) only when the matter is, in the auditor’s professional judgment, of such importance that it is fundamental to users’ understanding of the interim financial information, and to do so in a manner akin to an emphasis of matter paragraph? If not, please explain your reasons and provide suggestions for how such matters should be addressed in ED-2410.

Overall response: **Agree, with comments below**

Detailed comments (if any):

We recommend aligning the presentation of Close Call situations with the approach used for Emphasis of Matter paragraphs in the ISAs to enhance consistency and user understanding. For example, paragraph 111 of ED-2410 states: *“If a matter related to going concern, other than a material uncertainty, is disclosed in the interim financial information and, in the auditor’s judgment, the matter is of such importance that it is fundamental to users’ understanding of the interim financial information, the auditor shall, in the separate Going Concern section required by paragraph 108, include: (Ref: Para. A174-A175)*

- *A reference to the related disclosure(s) in the interim financial information; and*
- *A statement that the auditor’s interim review conclusion is not modified in respect of the matter.”*

In the ISAs, however, such a matter would ordinarily be communicated in an Emphasis of Matter paragraph. Adopting a different presentation in ED-2410 may create confusion for users and reduce consistency between the standards.

The Auditor's Interim Review Report

General

14. Do you agree with the proposed new structure of the auditor's interim review report? In particular, consider whether the new structure may be clearer for intended users of the report since it is consistent with the structure of the auditor's report on the financial statements. If not, please explain your reasons, including any suggestions for how the interim review report can be made clearer for intended users.

(See Section I-H, paragraphs 65-68 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

N/A

The Auditor's Interim Review Conclusion

15. Do you foresee any practical consequences from the approach in ED-2410 that the auditor's interim review conclusion would differ, depending on whether the applicable financial reporting framework is a fair presentation framework or a compliance framework, as defined in paragraph 13(b) of ED-2410? Please be as specific as possible in describing any potential issues and suggestions for how the IAASB may address them.

(See Section I-H, paragraphs 69-73 in the EM)

Overall response: **No (with no further comments)**

Detailed comments (if any):

N/A

Other Matters

16. Are there any other matters you would like to raise in relation to ED-2410? If so, please clearly indicate the specific paragraph numbers of any requirements, application material, or Appendix, to which your comments relate. If you provide views on other matters, please use subheadings in your response to clearly identify and distinguish different matters.

Overall response: **Yes, as further explained below**

Detailed comments (if any):

- a) Paragraph 3: There are nuances specific to interim financial information review that may not be included in ISRE 2400, which would almost always require adaptation of ISRE 2400. Such matters could have been accommodated in this standard as specific considerations when the review is performed by a practitioner who is not the independent auditor of the entity's annual financial statements. For example, Group interim review engagement requirements (par 39-40).

- b) Paragraph 7: It is not clear whether, when the auditor identifies material misstatements through the performance of review procedures (inquiries and analytical procedures), the auditor may conclude on the interim financial information without performing additional procedures.

It is understandable that, when the auditor identifies areas where material misstatements may arise, additional procedures would be necessary to resolve those matters. However, the standard does not appear to clearly distinguish between circumstances where material misstatements have been identified and circumstances where the auditor has merely identified areas in which material misstatements may arise. Clarification of this distinction would assist in understanding when additional procedures are required.

- c) Paragraph 13, definitions: Can the terms “additional procedures” be included in the definitions, similarly to the term “review procedures,” which has been included (par 13(i))?
- d) Paragraph 13, definitions: Defining the concept of “where material misstatements are likely to arise” in this standard or in the glossary terms would be helpful in clarifying how it differs from the concept of “risk of material misstatement.”
- e) Paragraph A23 as an example: References to ISAs being made in this standard to illustrate certain points may cause the auditor to think that this standard is expected to be ready and understood in reference to ISAs, especially for concepts that are not specifically included in this standard.

Translations

17. Recognizing that many respondents may intend to translate the final standard for adoption in their own environments, have you identified any potential translation challenges or issues?

If so, please describe the issue identified and clearly indicate the specific paragraph numbers of any requirements, application material, or specific illustrations or appendices to which your comments relate.

Overall response: **No response**

Detailed comments (if any):

N/A

*Effective Date*

18. The IAASB believes that an appropriate implementation period would be approximately 18 months after the expected date of approval of the proposed revised standard. Do you agree that this will provide a sufficient period to support effective implementation of the proposed standard? If not, what do you propose and why?

(See Section I-I, paragraphs 85-86 in the EM)

Overall response: **Disagree, with comments below**

Detailed comments (if any):

We recommend extending the implementation period from 18 months to 24 months to allow sufficient time for Supreme Audit Institutions to update methodologies, develop guidance, train staff, and translate the standard where necessary.

Questions to Inform the International Ethics Standards Board for Accountants (IESBA)

The IESBA is seeking views from respondents related to the application of the IESBA Code. Respondents for whom these questions are relevant are encouraged answer these questions to inform the IESBA's consideration of the need for any future actions.

(See the Introduction, paragraphs 12-14, and Section I-C in the EM)

Group Interim Review Engagements

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

- (a) Given the context set out in Section I-C, paragraph 28, in the EM and taking into account that Part 4A of the Code applies to both audit and review engagements unless otherwise stated, do you believe there is a need to clarify the application of Section 405 with respect to group review engagements, including group interim reviews? If so, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **No (with no further comments)**

Detailed comments (if any):

N/A

Non-compliance or Suspected Non-compliance with Laws and Regulations

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

- (b) Do you believe the application of the Code as described in Section I-C, paragraph 29, in the EM is clear when information concerning non-compliance or suspected non-compliance with laws and regulations comes to the auditor's attention when performing an interim review engagement? If not, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

N/A

This document was prepared by the Staff of the International Auditing and Assurance Standards Board (IAASB).

The objective of the IAASB is to serve the public interest by setting high-quality auditing, assurance, and other related services standards and by facilitating the convergence of international and national auditing and assurance standards, thereby enhancing the quality and consistency of practice throughout the world and strengthening public confidence in the global auditing and assurance profession.

The IAASB develops auditing and assurance standards and guidance under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Stakeholder Advisory Council, which provides public interest input into the development of the standards and guidance.

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