THE POWER OF BEING UNDERSTOOD

AUDIT I TAX I CONSULTING

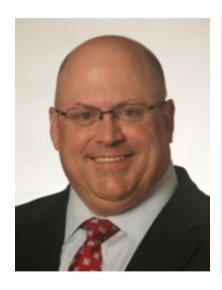


2018 – AUDITING AND ATTESTATION STANDARDS UPDATE

New England Intergovernmental Audit Forum November 8, 2018



Today's presenter



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Learning objectives

- After completing this program, you should know more about:
 - Key changes that will result from the 2018 revision to Government Auditing Standards (also referred to as GAGAS or the Yellow Book)
 - Effective date considerations
 - Other 2018 Yellow Book emphasis areas
 - Recently issued auditing and attestation standards and guidance
 - Recent Exposure Drafts



Terminology and Abbreviations

CPE	Continuing Professional Education	HUD	U.S. Department of Housing and Urban Development
ED	Exposure Draft	IT	Information Technology
F/S	Financial Statements	OMB	Office of Management and Budget
GAAS	Generally Accepted Auditing Standards	PR	Peer Review
GAGAS	Generally Accepted Government Auditing Standards or Yellow Book	SKE	Skill, Knowledge, or Experience
GAO	Government Accountability Office	SSARS	Statements on Standards for Accounting and Review Services
GAS-SA Guide	AICPA Audit Guide, Governmental Auditing Standards and Single Audits	TCWG	Those Charged With Governance
GASB	Government Accounting Standards Board	UG	Uniform Guidance
		YB	Yellow Book



KEY CHANGES MADE TO THE 2018 YELLOW BOOK



Yellow Book Revision Process

 ED was issued for public comment in April 2017. GAO received over 1,700 individual comments. Final standards issued in July 2018

 Consultation with Advisory Council on Government Auditing Standards both at ED stage and in developing final standards





Accessing the 2018 Yellow Book

- The 2018 Yellow Book can be accessed on the GAO Yellow Book Web page; or you can access the PDF file directly
- Paper editions are expected to be available for sale via the Government Publishing Office in Fall 2018
 - Printed version will be larger than usual
- The <u>GAO Yellow Book Web page</u> also includes:
 - Podcast on the 2018 Yellow Book
 - 2011 version of the Yellow Book
 - GAO contact information





Effective Date

For financial
audits,
attestation
engagements,
and reviews of
financial
statements for
periods ending
on or after
June 30, 2020

For
performance
audits
beginning.on.or
after.July.1
2019

2018 YB supersedes:

- 2011 YB
- 2005 GAO
 CPE
 quidance
- 2014GAO
 peer review
 ratings
 guidance

Early implementation is not permitted!



Summary of Key Change Areas from 2011 YB

- New format and organization
- Independence requirements related to nonaudit services
- CPE
- Peer review requirements
- Finding guidance
- Waste and abuse
- Standards for reviews of financial statements
- Performance audits
- Other



New Format and Organization

Presented in a "clarified" format

- Requirements appear in boxes
- Application guidance included after each boxed requirement

Chapters are reorganized and realigned

 Certain topic areas that had previously been combined are now separated, resulting in 9 chapters

Supplemental guidance in Appendices from the 2011 YB is either removed or incorporated into 2018 YB



Example of "Clarified" Format

Professional Judgment

Requirement: Professional Judgment

3.109 Auditors must use professional judgment in planning and conducting the engagement and in reporting the results.

Application Guidance: Professional Judgment

3.110 Professional judgment includes exercising reasonable care and professional skepticism. Reasonable care includes acting diligently in accordance with applicable professional standards and ethical principles. Attributes of professional skepticism include a questioning mind, awareness of conditions that may indicate possible misstatement owing to error or fraud, and a critical assessment of evidence. Professional skepticism includes being alert to, for example, evidence that contradicts other evidence obtained or information that brings into question the reliability of documents or responses to inquiries to be used as evidence. Further, it includes a mindset in which auditors assume that management is neither dishonest nor of unquestioned honesty. Auditors may accept records and documents as genuine unless they have reason to believe the contrary. Auditors may consider documenting procedures undertaken to support their application of professional skepticism in highly judgmental or subjective areas under audit.

3.111 Using the auditor's professional knowledge, skills, and abilities, in good faith and with integrity, to diligently gather information and



Auditor Responsibility under Yellow Book

- Unconditional requirements auditor "must" comply with where relevant; identified with use of "must"
- Presumptively mandatory requirements auditor must comply with except in rare circumstances; identified with use of "should"
 - If depart from, should perform alternative procedures and document justification
- Application guidance provides further explanation of the requirements and guidance for applying them; identified with "may," "might," and "could."



Independence Changes

- Most significant changes relate to performance of non-audit services that include preparing accounting records and financial statements
- 2018 YB retains much of its other independence requirements and guidance



Independence Threats Related to Preparing Accounting Records and F/S

2018 YB indicates that nonaudit services in this area fall into three categories:

- Those that automatically impair independence
- Those that are significant threats
- Those that are threats



Activities that **Impair Independence**:

Preparing Accounting Records and Financial Statements

 Determining or changing journal entries, account codes or classifications for transactions, or other accounting records for the entity without obtaining management's approval;

See Yellow Book paragraph 3.87

- Authorizing or approving the entity's transactions; and
- Preparing or making changes to source documents without management approval



Activities that are Significant Threats:

Preparing Accounting Records and Financial Statements

 Auditors should conclude that preparing F/S in their entirety from a client-provided trial balance or underlying accounting records creates significant threats

See Yellow Book paragraph 3.8



Activities that are **Threats**:

Preparing Accounting Records and Financial Statements

Any other services related to preparing accounting records and F/S create a <u>threat</u> whose evaluation for significance <u>must be</u> <u>documented</u>

- Recording transactions for which management has determined or approved the appropriate account classification, or posting coded transactions to an audited entity's general ledger;
- Preparing certain line items or sections of the F/S based on information in the trial balance
- Posting entries that an audited entity's management has approved to the entity's trial balance; and
- Preparing account reconciliations that identify reconciling items for the audited entity management's evaluation

See Yellow Book paragraph 3.89



Factors in Evaluating Significance of Threats:

Preparing Accounting Records and Financial Statements

Extent outcome could have material effect on F/S

Degree of subjectivity in determining amounts or treatment

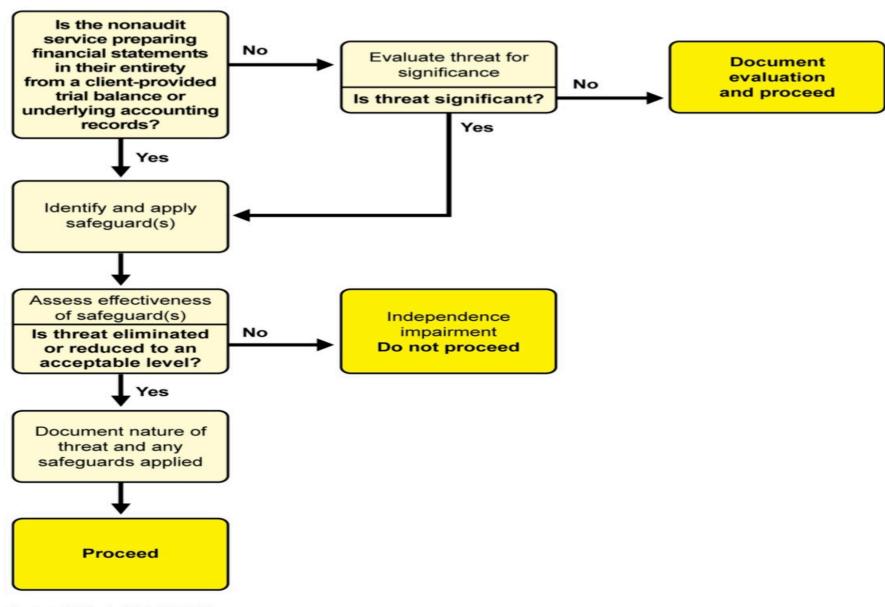
Extent of entity's involvement in determining significant matters of judgment

DON'T FORGET!

Under the 2018 YB, you are required to document your evaluation of the significance of a threat created by preparing accounting records and F/S.



Figure 2: Independence Considerations for Preparing Accounting Records and Financial Statements



Source: GAO. | GAO-18-568G

New Application Guidance on Clerical Assistance

 Providing clerical assistance, such as typing, formatting, printing, and binding F/S, is <u>unlikely</u> to be a significant threat.



See Yellow Book paragraph 3.95



New SKE Application Guidance – YB paragraph 3.79

Management is not required to possess expertise needed to perform or re-perform the services.

Indicators of management's ability to effectively oversee the nonaudit service include management's ability to:

- determine the reasonableness of the results of the nonaudit service provided
- recognize a material error, omission, or misstatement in the results of the nonaudit services provided.

YB REQUIREMENT (YB 3.73): Auditor should determine that the audited entity has designated an individual who possesses suitable SKE and that understands the services to be provided sufficiently to oversee them.



CAUTION!!! Consider Independence Period

Per YB paragraph 3.20, auditors and audit organizations should be independent from an audited entity during:

- Any period of time that falls within the period covered by the financial statement or subject matter of the engagement and;
- The period of the professional engagement



Independence guidance for government audit organizations

Recognizes that audit organizations in government entities frequently provide services that differ from the traditional professional services a firm provides. These types of services are often provided:

- in response to a statutory requirement;
- at the discretion of the authority of the audit organization, or;
- to an engaging party (such as a legislative oversight body or an independent external organization)

Generally they do not create a threat to independence.



Independence guidance for government audit organizations

- Examples of types of services that generally would not create a threat to independence:
 - Providing assistance and technical expertise to legislative bodies
 - Providing assistance in reviewing budget submissions
 - Providing audit, investigative, and oversightrelated services that do not involve a GAGAS engagement, such as
 - Investigations of alleged fraud
 - Periodic audit recommendation follow-up engagements and reports

See
Yellow Book
paragraph
3.72 for a full
list of
examples



CPE Requirements

- 2018 YB <u>does not</u> include a 4-hour GAGAS qualification
 CPE requirement that had been proposed in the ED
 - Instead, added application guidance related to obtaining GAGAS - specific CPE each time a new Yellow Book revision is issued

NEW APPLICATION GUIDANCE: Obtaining CPE specifically on GAGAS, particularly during years in which there are revisions to the standards, may assist auditors in maintaining the competence necessary to conduct GAGAS engagements. (YB 4.19)

Incorporated relevant sections of previous separate
 CPE guidance document and tweaked a few other sections



CPE Guidance Addition

 Relevant guidance from the 2005,
 Guidance on GAGAS Requirements for Continuing Professional Education, has been incorporated into the 2018 YB



- Guidance incorporated includes topics such as:
 - Subject matter of CPE
 - Programs and activities that qualify for CPE
 - Measurement of CPE



Other Competency and CPE "Tweaks"

- More emphasis that audit organization have responsibility for:
 - assigning competent auditors
 - ensuring collective competence of auditors conducting the engagement <u>before beginning</u> work on the <u>engagement</u>
 - having processes so that workforce has essential knowledge, skills and abilities
 - maintaining documentation of each auditor's CPE
- New exception to the YB CPE hour requirement for non- supervisory auditors charging less than 40 hours annually to YB audits (YB paragraph 4.26)



Qualifications and Competency of Specialists

YB Paragraph 4.12: The engagement team should determine that specialists assisting the engagement team on a GAGAS engagement are qualified and competent in their areas of specialization.

- To understand this requirement for specialists you need to understand the definitions of the following:
 - Auditor
 - Engagement Team
 - Specialist

See Yellow Book paragraphs
4.13 – 4.15 for application guidance related to "should" in paragraph 4.12



Yellow Book Auditor Definitions

 Auditor: An individual assigned to planning, directing, performing engagement procedures or reporting on GAGAS engagements (including work on audits, attestation engagements, and reviews of financial statements) regardless of job title. Therefore, individuals who may have the title auditor, information technology auditor, analyst, practitioner, evaluator, inspector, or other similar titles are considered auditors under GAGAS. (YB paragraph 1.27(f))



Yellow Book Team and Specialists Definition

- Engagement team (or audit team): Auditors assigned to planning, directing, performing engagement procedures or reporting on GAGAS engagements. (YB paragraph 1.27(i))
- Specialist: An individual or organization possessing special skill or knowledge in a particular field other than accounting or auditing that assists auditors in conducting engagements. A specialist may be either an internal specialist or an external specialist. (YB paragraph 1.27(p))



Other Specialist Definitional Application Guidance

 Some engagements may necessitate the use of specialized techniques or methods that call for the skills of specialists. Specialists do not include individuals with special skill or knowledge related to specialized areas within the field of accounting or auditing, such as income taxation and information technology. Such individuals are considered auditors. (YB paragraph 4.13)



Application Guidance on Applying YB CPE to Specialists

- External specialists are not auditors subject to the GAGAS CPE requirements. (YB paragraph 4.30)
- Internal specialists assisting on a GAGAS engagement who are not involved in planning, directing, performing engagement procedures, or reporting on a GAGAS engagement are not auditors subject to the GAGAS CPE requirements. (YB paragraph 4.30)



Application Guidance on Applying YB CPE to Specialists

- Internal specialists who are performing work in accordance with GAGAS as part of the engagement team—including planning, directing, performing engagement procedures, or reporting on a GAGAS engagement—are considered auditors and are subject to the GAGAS CPE requirements. (YB paragraph 4.31)
- Because internal specialists apply specialized knowledge in government engagements, CPE in their areas of specialization qualifies under the requirement for 24 hours of CPE that directly relates to government auditing, the government environment, or the specific or unique environment in which the audited entity operates. (YB paragraph 4.31)



Falsehoods heard in the hallways....

"I'm on the financial statement audit team for my client and not the compliance audit team doing the single audit.

Luckily, I don't have to worry about all of that Yellow Book CPE stuff"



Yellow Book Competence and CPE

- Competence is derived from education and experience
- Assigned staff must collectively possess the competence needed to address engagement objectives, perform work in accordance with GAGAS and for their assigned roles
- Indicators of competence:
 - Technical knowledge and skills in areas such as GAGAS, standards, regulations, techniques, tools, and guidance
 - Competence for assigned roles (e.g., supervisory auditor, partner) this is new in 2018 YB



Yellow Book Competence and CPE

- Auditors who plan, direct, perform, or report on a YB engagement should maintain competence by completing at least 80 hours of CPE in every 2-year period as follows:
- 24 hours of CPE in subject matter directly related to:
 - the government environment,
 - government auditing, or
 - the specific or unique environment in which the audited entity operates
- 56 hours of CPE in subject matter that directly enhance the auditor's professional expertise to conduct engagements



Yellow Book CPE Exceptions (2018 YB)

- Auditors may be exempted from the 56-hour CPE requirement by the audit organization, but not the 24- hour requirement, if they:
 - charge less than 20 percent of their time annually to YB engagements, and
 - are only involved in performing engagement procedures, but not involved in planning, directing, or reporting on the engagement
- Nonsupervisory auditors who charge less than 40 hours of their time annually to YB engagements may be exempted by the organization from all YB CPE requirements (new in 2018 YB)



Other challenging CPE areas

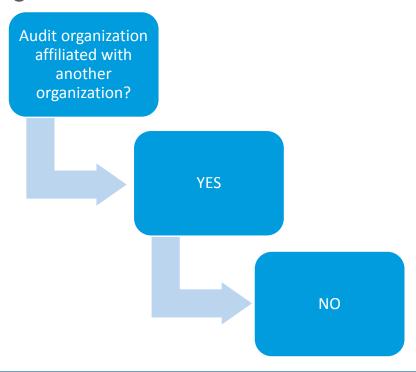
- Determining measurement period
- Prorating CPE hours for auditors hired or assigned to a YB engagement after beginning of 2-year CPE period
- Maintaining documentation of CPE hours completed by each auditor





Peer Review Requirements

2018 YB differentiates requirements for those audit organizations affiliated with a recognized organization



AICPA and the National State Auditors Association are included on recognized organization list



Peer Review Requirements

Audit organizations affiliated with a recognized PR organization

- Comply with the respective organization's PR requirements
- Additional GAGAS peer review requirements in areas such as:
 - Selection of GAGAS engagements,
 - Peer review report ratings, and
 - Availability of peer review report to the public

Audit organizations NOT affiliated with a recognized PR organization

- Comply with GAGAS PR requirements in such areas as:
 - Selection of GAGAS engagements
 - · Peer review report ratings
 - Availability of the peer review report to the public
 - Written agreement for peer review
 - Peer review team
 - Report content
 - Audit organization's response to the peer review report



Findings – New Requirement and Application Guidance for Developing "Cause" Element

- New Requirement: Auditors <u>should</u> consider internal control deficiencies in their evaluation of identified findings when developing the cause element (YB paragraphs 6.18 and 7.20)
- New Application Guidance: Considering internal control in the context of a comprehensive internal control framework, such as Standards for Internal Control in the Federal Government or Internal Control—Integrated Framework, can help auditors to determine whether underlying internal control deficiencies exist as the root cause of findings. Identifying these deficiencies can help provide the basis for developing meaningful recommendations for corrective actions. (YB paragraphs 6.30 and 7.32)

Relates to financial audits, attestation engagements and reviews



Waste and Abuse

2011 YB includes a "trip across" requirement to report abuse when an auditor becomes aware of it

2018 YB transitions the discussion of abuse, along with a new concept of waste, to application guidance related to findings

- New Application Guidance:
 - Evaluating internal control in a government environment may also include considering internal control deficiencies that result in waste or abuse.
 - Because the determination of waste and abuse is subjective, auditors are not required to perform specific procedures to detect waste or abuse in financial audits.
 - However, auditors may consider whether and how to communicate such matters if they become aware of them.
 - Auditors may also discover that waste or abuse are indicative of fraud or noncompliance with provisions of laws, regulations, contracts, and grant agreements.

See Yellow Book paragraphs 6.20-6.24



Waste Definition and Examples

- Waste is the act of using or expending resources carelessly, extravagantly, or to no purpose. Importantly, waste can include activities that do not include abuse and does not necessarily involve a violation of law. Rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight.
- The following are examples of waste, depending on the facts and circumstances:
- Making travel choices that are contrary to existing travel policies or are unnecessarily extravagant or expensive.
- Making procurement or vendor selections that are contrary to existing policies or are unnecessarily extravagant or expensive

Abuse definition and related examples in 2018
YB consistent with the 2011 YB



Standards for Review of Financial Statements

- 2018 YB adds requirements and guidance for reviews of financial statements in accordance with GAGAS
- Incorporates by reference SSARS No 21, Section 90, Review of Financial Statements
- Adds additional requirements in following areas:
 - Licensing and certification
 - Noncompliance
 - Reporting compliance with GAGAS
 - Distribution of reports



Performance audits: management assertion clarification

2018 YB now has an explicit statement that assertions are not required for performance audits

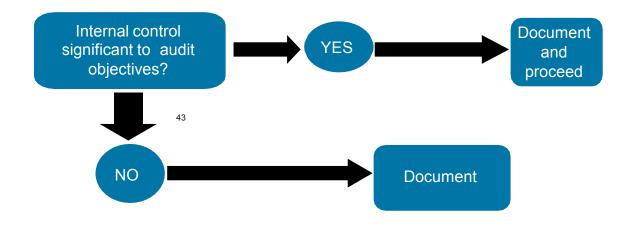
"In performance audits conducted in accordance with GAGAS, auditors are the party who measures or evaluates the subject matter of the engagement and who presents the resulting information as part of, or accompanying, the audit report.

Therefore, GAGAS does not require auditors to obtain management assertions with respect to the subject matter when conducting a performance audit."

See Yellow Book paragraph 8.14



Performance audits: new internal control requirement



Reassess, as applicable, for new or refined objectives

Auditors should document the significance of internal control to performance audit objectives



If internal control significant to performance audit objectives:

Obtain an understanding of internal control that is significant to the audit objectives:

- Assess and document the assessment of internal control to the extent necessary to address the audit objectives
- Evaluate and document the significance of identified internal control deficiencies within the context of the audit objectives
- Consider internal control deficiencies when developing the cause element of findings
- Identify in the audit report which internal control components and principles are significant



Other changes of note - minor wording changes throughout

- Glossary added to the end of the Yellow Book
- The term "audit" was replaced with "engagement"
- The term "performance" was replaced with "conducting"
- Other minor wording tweaks; for example:
 - The 2011 YB paragraph 3.65 said ". . . considering any threats to independence,"
 - The 2018 YB paragraph 3.114 revised that section to ". . . identifying and evaluating any threats to independence,"



Other Changes of Note – Reporting Application Guidance

- Disclaimer of opinion auditors may revise the statement that the auditor was engaged to audit the F/S
- Auditors should make the report on internal control and compliance available to users in the same manner as the financial audit report (if separate reports are used)
- YB report relates only to the most recent reporting period included, when comparative F/S are present



Falsehoods heard in the hallways...

"You do Yellow Book audits, right? I bet auditing the implementation of that GASB pension standard was hard!"

"All I know is the client is a government – so that means we have to follow the Yellow Book."



Emphasis Area: When does the Yellow Book apply?

When required (for example, by law, regulation, contract, grant agreement, and policy)

 Usually participation in federal programs (such as grants or loan programs) over a certain dollar threshold triggers a Yellow Book requirement (and related compliance audit)

See 2018 YB paragraphs 1.08 – 1.11

When not required, auditees may voluntarily engage auditors to apply the YB on the engagement



When does the Yellow Book Apply?

Audit requirement	GAGAS applicable?
Single audit	YES
HUD Consolidated Audit Guide	YES
U.S. Dept. of Education Proprietary Schools Audit Guide	YES
F/S audit of GASB reporting entity	Maybe
Agreed-upon procedures engagement on grant compliance	Maybe



It's a piece of cake...layer cake





Emphasis area: What do *Government Auditing*Standards require above AICPA (GAAS) requirements?





Additional YB requirements for financial statement audits

- Ethical principles, independence, and professional judgement
- Competency and CPE
- Tests of compliance and other matters
- Reporting and findings



Ethical principles, independence and professional judgment (chapter 3)

- Requirements in chapter 3 are intended to be followed in conjunction with all other applicable GAGAS requirements
- Ethical principles provide the foundation, discipline, and structure, as well as the environment, that influence the application of GAGAS
- Requirements and application guidance provided for both independence and the auditor's use of professional judgment

Auditors also need to comply with AICPA requirements in these areas when the audit is also done under GAAS



Yellow Book Independence

- YB uses a conceptual framework approach
- GAO provides a list of specifically prohibited nonaudit services; it does not provide a list of permitted nonaudit services or relationships

CAUTION!

All independence considerations, and documentation thereof, need to run through the YB independence conceptual framework!



Independence: Differences between AICPA and GAGAS

- WHEN the conceptual frameworks are applied
- GAO's will be used more often than AICPA's
 Documentation of the assessment of management's
 SKE
- Comparison of AICPA to 2011 YB Independence rules available on AICPA website
 - AICPA currently working on an update to this comparison for the 2018 YB; GAQC will communicate when complete



Falsehoods heard in the hallways...

"I'm doing a Yellow Book financial statement audit. Luckily the client doesn't get any federal funds so is not subject to a single audit. Whew!

I'm just so glad I don't have to worry about compliance on this audit because I just don't have the budget for it!"



Yellow Book tests of compliance and other matters

AICPA GAAS

- Test provisions of laws and regulations have a direct and material effect on the financial statements and disclosures
- Test provisions of laws and regulations that do not have a direct and material effect but compliance with which may be fundamental to operating aspects of the entity, the entity's ability to continue operating, or for the entity to avoid material penalties
- GAGAS incremental requirements
 - States that auditors should extend the AICPA requirements concerning consideration of noncompliance with laws and regulations to include consideration of noncompliance with provisions of contracts and grant agreements
 - Under 2011 YB only: consideration of abuse (when we become aware)



Yellow Book Findings to Report

Source: Table 4-1, AICPA Audit Guide, GAS and Uniform Guidance Audits	Report in Yellow Book Report	Comm. in Writing	Use Judgment
Deficiencies in internal control over financial reporting:			
Significant deficiencies and material weaknesses	X		
Other deficiencies in IC that are not SDs or MWs			X
Fraud and noncompliance with provisions of laws or regulations:			
Has a material effect on the FS and any other instances that warrant the attention of TCWG	Х		
Does not warrant the attention of TCWG			Х
Noncompliance with provisions of contracts and grant agreements	:		
Has a material effect on the FS or other financial data significant to the audit objectives	Х		
Has an effect on the FS that is less than material but warrants the attention of TCWG		Х	
Does not warrant the attention of TCWG			Χ



Yellow Book – Format of Findings

- Elements of an audit finding (2018 YB paragraphs 6.25 – 6.28)
 - Criteria–What should we have seen?
 - Condition–What did we see?
 - Cause–Why did we see what we saw?
 - Effect or potential effect–What is the result of what we saw?
 - Views of responsible officials (2018 YB paragraphs 6.57 -6.60)
 - Context/perspective—Significance or importance of what we saw (2018 YB paragraph 6.51)
 - Recommendations—How do we not see it again (2018 YB paragraph 6.52 states that auditors may include recommendations if they sufficiently develop the elements of a finding)
 - There may be additional elements for reporting findings that are required by other requirements (e.g., Uniform Guidance)



Yellow Book – Findings to Report

- Auditors need to go the extra mile with GAGAS
 - Investigate enough to "tell the story"
 - Be able to report the required elements of a finding
 - Keep in mind what users will need to know to be able to track correction and possibly take other action



Emphasis Area – Reporting under GAGAS

Auditor's Report on the Financial Statements

- State our compliance with Government Auditing Standards
- Reference to separate reporting on internal control and compliance
- Special "purpose alert" language

"Yellow Book Report" or "GAGAS Report"

Proper Name:

Report on Internal Control Over
Financial Reporting
and on Compliance
and Other Matters
Based on an Audit
of Financial Statements
Performed in Accordance With
Government Auditing Standards

Relates to the Financial Statements!

Internal Control over Financial

over Financial Reporting

Compliance

which could have a direct and material effect on determination of financial statement amounts



AICPA Illustrative Yellow Book Reports

- AICPA Audit Guide, <u>Government Auditing Standards</u> <u>and Single Audits</u>, contains numerous illustrations including:
 - Auditor's Report on the Financial Statements (referring to GAGAS)
 - Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance With Government Auditing Standards
- The GAQC has posted <u>excerpts of these reports on</u> the GAQC Web site and have left them open
- Other YB report illustrations may appear in federal agency audit guides – use with caution!



Emphasis Area – Other Incremental Considerations

Auditor/client communications

- Engagement letter
- Communications with TCWG
- Written representations from management

Planning and performing:

- Previous audits and attestation engagements
- Materiality-public interest

Audit documentation

- Independence
- Departure from GAGAS
- Supervisory review

Distribution of reports

Make individuals/documentation available upon request and timely

Peer review report



Falsehoods heard in the hallways...

"We just finished this audit and issued our GAAS audit report, just like always. Now the client tells me they actually were supposed get the audit done under Government Auditing Standards. They are practically the same thing - can't I just change the terminology in the report?"



Emphasis area – Learning of a YB requirement late or after the audit is complete

- As we just reviewed, the YB has additional requirements in it such that it would not be appropriate to simply change the report to add a GAGAS reference
- Facts and circumstances will dictate auditor actions
- Ensure that audit organization quality control resources are involved in conversations when this situation occurs



AICPA AUDITING STANDARDS UPDATE



AICPA – ASB – SAS 132, The Auditor's Consideration of the Entity's Ability to Continue as a Going Concern

- Issued February 2017 and effective for periods ending on or after December 15, 2017
- Going concern basis of accounting
- Ability to continue as a going concern
- Adequacy of disclosures
- Report accordingly



AICPA – ASB – SAS 132, The Auditor's Consideration of the Entity's Ability to Continue as a Going Concern

- Auditor's objectives and related conclusions
 - Use of going concern basis of accounting
 - Substantial doubt about ability to continue as going concern Required to ask about period beyond management's assessment
- Financial statements prepared in accordance with a special purpose framework
 - Going concern basis may not be relevant
 - Need to consider if substantial doubt exists
- Use of emphasis paragraphs when substantial doubt alleviated ("close calls")



AICPA –ASB – SAS 133, Auditor Involvement with Exempt Offering Documents (AU-C 945)

Effective for exempt offering documents that are initially distributed, circulated, or submitted on or after June 15, 2018

Requirements when auditor is involved with exempt offering document

- Subsequent events
- Other information

Involvement determined by two benchmarks

- Inclusion of auditor report in exempt offering document
- Auditor meets one or more "trigger" activities



AICPA –ASB – SAS 133, Auditor Involvement with Exempt Offering Documents (AU-C 945)

Trigger activities are:

- Assisting the entity in preparing information included in the offering document
- Reading a draft of the offering document at the entity's request
- Issuing a comfort letter
- Participating in due diligence discussions
- Issuing an attestation report on information relating to the exempt offering
- Providing written agreement for the use of the auditor's report in the offering document
- Updating the auditor's report for inclusion in the offering document



AICPA – ASB – Exposure Draft: Auditor Reporting and Addressing Disclosures in the F/S Audit

- Opinion section mandated first
 - New sections:
 - Key Audit Matters:
 - Optional to include but requirements if opt to include
 - "What keeps the auditor up at night"
 - Expanded descriptions of auditor and management responsibility, including relating to going concern
- Will affect financial statement audit reports in the future; less certain about compliance audit reports



AICPA – Audit and Attest Team – TQAs on definition of a government

Several nonauthoritative questions and answers were issued on the following topics:

- Determining whether an entity is a SLG for purposes of determining appropriate accounting standards
- The appropriate reporting when a SLG prepares its F/S in accordance FASB standards
- The acceptability of a SPF used by management
- Reporting on an Indian tribe's F/S (or a tribal business component functioning like a commercial entity) when presented in accordance with accounting standards as promulgated by FASB



AICPA – Peer Review – Study of Single Audits

About the study

Population of audits

- 1,100 single audits subject to peer review
- Year-ends of 11/30/15 or prior Sample
- 87 randomly selected single audits (performed under OMB Circular A-133, Audits of States, Local Governments and Nonprofit Organizations) Methodology
- Firm completed questionnaire addressing 37 quality factors
- Subject matter experts reviewed engagement
- AICPA assessed correlation between factors and conformity



AICPA – Peer Review – Factors driving quality – engagement partner competency

- Years of experience
- History of non-conformity
- Hours of single audit CPE in previous 3 years

Number of single audits performed annually:

Non-conformity %:

- Perform 1 audit annually 68% non-conformity
- Perform 2-10 audits annually 44% non-conformity
- Perform 11 or more 25% non-conformity



AICPA – Peer Review – Factors driving quality – engagement partner competency

If you perform under 10 single audits, ensure that:

- You are only accepting engagements that you are competent to perform
- Your practice aids and A&A guides are up to date
- Your engagement team is your "A" team (and "A" doesn't stand for "available")
- Consider experience and single audit-specific education of team
- Where appropriate, engage a knowledgeable third-party
- Perform appropriate consultations throughout the engagement
- Ensure EQCR criteria are appropriate in light of the risks



QUESTIONS AND ANSWERS?



THANK YOU FOR YOUR TIME AND ATTENTION



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