

Requirements in AT Sections 20, 50, 101, and 201 (a)	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements" (b)	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements" (c)	Requirements in Column (a) That Are in Chapter 3, "Review Engagements" (d)	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements" (e)
applicable attestation interpretation, the practitioner should be prepared to explain how he or she complied with the SSAE provisions addressed by such attestation guidance	Not included in the proposed SSAE. Also not included in the clarified Statements on Auditing Standards.			
AT Section 101 .03 When a practitioner undertakes an attest engagement for the benefit of a government body or agency and agrees to follow specified government standards, guides, procedures, statutes, rules, and regulations, the practitioner is obliged to follow those governmental requirements as well as the applicable attestation standards.	Paragraph 1.17			
.06 Any professional service resulting in the expression of assurance must be performed under AICPA professional standards that provide for the expression of such assurance. Reports issued by a practitioner in connection with other professional standards should be written to be clearly distinguishable from and not to be confused with attest reports. For example, a practitioner performing an engagement which is intended solely to assist an organization in improving its controls over the privacy of client data should not issue a report as a result of that engagement expressing assurance as to the effectiveness of such controls. Additionally, a report that merely excludes the words, "...was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants..." but is otherwise similar to an examination, a review or an agreed-upon procedures	Paragraph 1.3 identifies professional services to which the proposed SSAE does not apply. Paragraph 1.14 Not included in the proposed SSAE.			

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attest report may be inferred to be an attest report.				
.09 A practitioner may report on a written assertion or may report directly on the subject matter. In either case, the practitioner should ordinarily obtain a written assertion in an examination or a review engagement. A written assertion may be presented to a practitioner in a number of ways, such as in a narrative description, within a schedule, or as part of a representation letter appropriately identifying what is being presented and the point in time or period of time covered.		AT section 101 states that the practitioner "should ordinarily obtain a written assertion." Paragraph 2.8 of the proposed SSAE requires the practitioner to do so.	AT section 101 states that the practitioner should ordinarily obtain a written assertion." Paragraph. 3.11 of the proposed SSAE requires the practitioner to do so.	
.10 When a written assertion has not been obtained, a practitioner may still report on the subject matter; however, the form of the report will vary depending on the circumstances and its use should be restricted. fn. 4 In this section, see paragraphs .58 and .60 on gathering sufficient evidence and paragraphs .73 to .75 and .78 to .80 for reporting guidance.	.	This requirement was not carried forward because paragraph 2.8 requires the practitioner to obtain a written assertion when performing an examination engagement.	This requirement was not carried forward because paragraph 3.11 requires the practitioner to obtain a written assertion when performing a review engagement.	
.12 The practitioner may be engaged to gather information to enable the responsible party to evaluate the subject matter in connection with providing a written assertion. Regardless of the procedures performed by the practitioner, the responsible party must accept responsibility for its assertion and the subject matter and must not base its assertion solely on the practitioner's procedures. fn. 5	Paragraph 1.25(a) relates to responsibility for the subject matter.		.	

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<p>.13 Because the practitioner’s role in an attest engagement is that of an attestor, the practitioner should not take on the role of the responsible party in an attest engagement. Therefore, the need to clearly identify a responsible party is a prerequisite for an attest engagement. A practitioner may accept an engagement to perform an examination, a review or an agreed-upon procedures engagement on subject matter or an assertion related thereto provided that one of the following conditions is met.</p> <p>a. The party wishing to engage the practitioner is responsible for the subject matter, or has a reasonable basis for providing a written assertion about the subject matter if the nature of the subject matter is such that a responsible party does not otherwise exist.</p> <p>b. The party wishing to engage the practitioner is not responsible for the subject matter but is able to provide the practitioner, or have a third party who is responsible for the subject matter provide the practitioner, with evidence of the third party’s responsibility for the subject matter.</p>	Paragraph 1.25(a)			
<p>.14 The practitioner should obtain written acknowledgment or other evidence of the responsible party’s responsibility for the subject matter, or the written assertion, as it relates to the objective of the engagement. The responsible party can acknowledge that responsibility in a number of ways, for example, in an engagement letter, a representation letter,</p>		<p>Paragraph 2.41(c)(i)</p> <p>When the engaging party is also the responsible party and does not provide one or more written representations.</p> <p>Paragraph 2.45 directs the</p>	<p>Paragraph 3.32(c)(i)</p> <p>When the engaging party is also the responsible party and does not provide one or more written representations.</p> <p>Paragraph 3.36 directs</p>	

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<p>or the presentation of the subject matter, including the notes thereto, or the written assertion. If the practitioner is not able to directly obtain written acknowledgment, the practitioner should obtain other evidence of the responsible party’s responsibility for the subject matter (for example, by reference to legislation, a regulation, or a contract).</p>		<p>practitioner to discuss the matter with the appropriate party, reevaluate the integrity of those from whom the representations were obtained, or take appropriate action. Paragraph 2.A63 precludes an unqualified opinion and indicates that the refusal to provide representations may be sufficient to cause the practitioner to withdraw from the engagement.</p> <p>When the engaging party is different than the responsible party and the responsible party does not provide one or more written representations.</p> <p>Paragraph 2.46(a) of the proposed SSAE directs the practitioner to obtain oral responses from the responsible party regarding the matters in paragraph 2.41. If the responsible party provides satisfactory responses, the practitioner would not be precluded from issuing an unqualified opinion. However, use of the report would be restricted.</p>	<p>the practitioner to discuss the matter with the appropriate party, reevaluate the integrity of those from whom the representations were obtained, or take appropriate action.</p> <p>.</p> <p>When the engaging party is different than the responsible party and the responsible party does not provide one or more written representations.</p> <p>Paragraph 3.37(a) of the proposed SSAE directs the practitioner to obtain oral responses from the responsible party regarding the matters in paragraph 3.32. If the responsible party provides satisfactory responses, the practitioner would not be precluded from issuing an unqualified opinion. However, use of the report would be restricted.</p>	

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		Paragraph 2.46(b) states that if the responsible party refuses to provide written representations or satisfactory oral responses regarding the matters in paragraph 2.41, a scope limitation exists.	Paragraph 3.37(b) states that if the responsible party refuses to provide written reorientations or satisfactory oral responses regarding the matters in paragraph 3.32, a scope limitation exists and the practitioner should withdraw from the engagement.	
.17 A firm of practitioners has a responsibility to adopt a system of quality control in the conduct of a firm's attest practice. fn. 6 Thus, a firm should establish quality control policies and procedures to provide it with reasonable assurance that its personnel comply with the attestation standards in its attest engagements. The nature and extent of a firm's quality control policies and procedures depend on factors such as its size, the degree of operating autonomy allowed its personnel and its practice offices, the nature of its practice, its organization, and appropriate cost-benefit considerations.	Paragraph 1.6 refers to paragraph .12 of QC section 10, <i>A Firm's System of Quality Control</i> (AICPA, <i>Professional Standards</i>), which contains the requirement.			

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.19 The first general standard is—The practitioner must have adequate technical training and proficiency to perform the attestation engagement. 21 The second general standard is—The practitioner must have adequate knowledge of the subject matter.	Paragraph 1.30(a)–(b) and ET section 201, <i>General Standards</i> (AICPA, <i>Professional Standards</i>), of the AICPA Code of Professional Conduct.			
.23 The third general standard is—The practitioner must have reason to believe that the subject matter is capable of evaluation against criteria that are suitable and available to users.	Paragraph 1.25(b)(ii)			
.24 Criteria are the standards or benchmarks used to measure and present the subject matter and against which the practitioner evaluates the subject matter. fn. * Suitable criteria must have each of the following attributes: • Objectivity—Criteria should be free from bias. • Measurability—Criteria should permit reasonably consistent measurements, qualitative or quantitative, of subject matter. • Completeness—Criteria should be sufficiently complete so that those relevant factors that would alter a conclusion about subject matter are not omitted. • Relevance—Criteria should be relevant to the subject matter.	Now application guidance in paragraph 1.A35.			
.25 Criteria that are established or developed by groups composed of experts that follow due process procedures, including exposure of the proposed criteria	Now application guidance in paragraph 1.A37			

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for public comment, ordinarily should be considered suitable. Criteria promulgated by a body designated by the AICPA Governing Council under the AICPA Code of Professional Conduct are, by definition, considered to be suitable.				
.26 Criteria may be established or developed by the client, the responsible party, industry associations, or other groups that do not follow due process procedures or do not as clearly represent the public interest. To determine whether these criteria are suitable, the practitioner should evaluate them based on the attributes described in paragraph .24.	Now application guidance in paragraph 1.A39.			
.29 In evaluating the measurability attribute as described in paragraph .24, the practitioner should consider whether the criteria are sufficiently precise to permit people having competence in and using the same measurement criterion to be able to ordinarily obtain materially similar measurements. Consequently, practitioners should not perform an engagement when the criteria are so subjective or vague that reasonably consistent measurements, qualitative or quantitative, of subject matter cannot ordinarily be obtained. However, practitioners will not always reach the same conclusion because such evaluations often require the exercise of considerable professional judgment.	Now application guidance in paragraph 1.A10 and in the definition of <i>measurability</i> in paragraph 1.A35. Paragraphs 1.25(b)(ii) and 1.A35			
.30 For the purpose of assessing whether the use of particular criteria can be expected to yield reasonably consistent measurement and evaluation, consideration should be given to the	Paragraph 1.25(b)(i)			

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nature of the subject matter. For example, soft information, such as forecasts or projections, would be expected to have a wider range of reasonable estimates than hard data, such as the calculated investment performance of a defined portfolio of managed investment products.	Referred to in application guidance in paragraphs 1.A29–1.A30.			
.31 Some criteria may be appropriate for only a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria. For instance, criteria set forth in a lease agreement for override payments may be appropriate only for reporting to the parties to the agreement because of the likelihood that such criteria would be misunderstood or misinterpreted by parties other than those who have specifically agreed to the criteria. Such criteria can be agreed upon directly by the parties or through a designated representative. If a practitioner determines that such criteria are appropriate only for a limited number of parties, the use of the report should be restricted to those specified parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria.		2.52 (i)(i)	3.43 (h)(i)	
.33 The criteria should be available to users in one or more of the following ways: a. Available publicly b. Available to all users through inclusion in a clear manner in the presentation of the subject matter or in the assertion c. Available to all users through	Paragraphs 1.25(b) ii and 1.A44			

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inclusion in a clear manner in the practitioner’s report d. Well understood by most users, although not formally available (for example, “The distance between points A and B is twenty feet;” the criterion of distance measured in feet is considered to be well understood) e. Available only to specified parties; for example, terms of a contract or criteria issued by an industry association that are available only to those in the industry				
.34 If criteria are only available to specified parties, the practitioner’s report should be restricted to those parties who have access to the criteria as described in paragraphs .78 and .80.		Paragraph 2.52(<i>h</i>)(ii)	Paragraph 3.43(<i>h</i>)(ii)	
.35 The fourth general standard is—The practitioner must maintain independence in mental attitude in all matters relating to the engagement. fn. 7	Paragraph 1.24			
.36 The practitioner should maintain the intellectual honesty and impartiality necessary to reach an unbiased conclusion about the subject matter or the assertion. This is a cornerstone of the attest function.	Not explicitly stated in the proposed SSAE; implied by the independence requirements in paragraph 1.24.			
.39 The fifth general standard is—The practitioner must exercise due professional care in the planning and performance of the engagement and the preparation of the report.	The requirement is included in ET section 201.			
.42 The first standard of fieldwork is—The practitioner must adequately plan the work and must properly supervise any assistants.	Paragraph 1.31(<i>b</i>) and ET section 201	.		
.46 The practitioner should establish an understanding with the client regarding	Paragraph 1.27(<i>c</i>)(ii)	Paragraphs 2.5–2.6	Paragraphs 3.8–3.9	

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the services to be performed for each engagement. fn. 10 Such an understanding reduces the risk that either the practitioner or the client may misinterpret the needs or expectations of the other party. For example, it reduces the risk that the client may inappropriately rely on the practitioner to protect the entity against certain risks or to perform certain functions that are the client’s responsibility. The understanding should include the objectives of the engagement, management’s responsibilities, the practitioner’s responsibilities, and limitations of the engagement. The practitioner should document the understanding in the working papers, preferably through a written communication with the client. If the practitioner believes an understanding with the client has not been established, he or she should decline to accept or perform the engagement.	Paragraph 1.27(c)(ii)	Paragraph 2.6(a), objectives of the engagement. Paragraph 2.5	Paragraph 3.9(a), objectives of the engagement. Paragraph 3.8	
.47 The nature, extent, and timing of planning will vary with the nature and complexity of the subject matter or the assertion and the practitioner’s prior experience with management. As part of the planning process, the practitioner should consider the nature, extent, and timing of the work to be performed to accomplish the objectives of the attest engagement. Nevertheless, as the attest engagement progresses, changed conditions may make it necessary to modify planned procedures.		Paragraphs 2.11–2.12	Paragraph 3.12	
.49 Assistants should be informed of their responsibilities, including the	Paragraph 1.31(b)–(c), but no specific directive			

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objectives of the procedures that they are to perform and matters that may affect the nature, extent, and timing of such procedures. The practitioner with final responsibility for the engagement should direct assistants to bring to his or her attention significant questions raised during the attest engagement so that their significance may be assessed.	regarding raising questions. Paragraph .35 of QC section10			
.50 The work performed by each assistant should be reviewed to determine whether it was adequately performed and to evaluate whether the results are consistent with the conclusion to be presented in the practitioner's report.	Paragraph 1.31(c) Paragraph .35 of QC section 10			
.51 The second standard of fieldwork is—The practitioner must obtain sufficient evidence to provide a reasonable basis for the conclusion that is expressed in the report.		The first sentence of paragraph 2.38 states that “the practitioner should evaluate the sufficiency and appropriateness of the evidence obtained in the context of the engagement, and, if necessary attempt to obtain further evidence.”	The first sentence of paragraph 3.28 states that “the practitioner should evaluate the sufficiency and appropriateness of the evidence obtained in the context of the engagement and, if necessary, attempt to obtain further evidence.”	

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<p>.52 Selecting and applying procedures that will accumulate evidence that is sufficient in the circumstances to provide a reasonable basis for the level of assurance to be expressed in the attest report requires the careful exercise of professional judgment. A broad array of available procedures may be applied in an attest engagement. In establishing a proper combination of procedures to appropriately restrict attestation risk, the practitioner should consider the following presumptions, bearing in mind that they are not mutually exclusive and may be subject to important exceptions.</p> <p>a. Evidence obtained from independent sources outside an entity provides greater assurance about the subject matter or the assertion than evidence secured solely from within the entity.</p> <p>b. Information obtained from the independent attester’s direct personal knowledge (such as through physical examination, observation, computation, operating tests, or inspection) is more persuasive than information obtained indirectly.</p> <p>c. The more effective the controls over the subject matter, the more assurance they provide about the subject matter or the assertion.</p>		Now application guidance in paragraph 2.A52.	Not included in chapter 3 of the proposed SSAE	
<p>.54 In an attest engagement designed to provide a high level of assurance (referred to as an examination), the practitioner’s objective is to accumulate sufficient evidence to restrict attestation risk to a level that is, in the practitioner’s</p>				

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professional judgment, appropriately low for the high level of assurance that may be imparted by his or her report. In such an engagement, a practitioner should select from all available procedures—that is, procedures that assess inherent and control risk and restrict detection risk—any combination that can restrict attestation risk to such an appropriately low level.		Significant discussion of appropriate procedures in paragraphs 2.17–2.36 and the related application guidance		
.56 Nevertheless, there will be circumstances in which inquiry and analytical procedures (a) cannot be performed, (b) are deemed less efficient than other procedures, or (c) yield evidence indicating that the subject matter or the assertion may be incomplete or inaccurate. In the first circumstance, the practitioner should perform other procedures that he or she believes can provide him or her with a level of assurance equivalent to that which inquiries and analytical procedures would have provided. In the second circumstance, the practitioner may perform other procedures that he or she believes would be more efficient to provide him or her with a level of assurance equivalent to that which inquiries and analytical procedures would provide. In the third circumstance, the practitioner should perform additional procedures.			Now application guidance in paragraph 3.A1 (“the practitioner may perform other procedures”). Now application guidance in paragraph 3.A17 (“the practitioner may determine it is appropriate to perform additional procedures”).	
.57 The extent to which attestation procedures will be performed should be		Paragraph 2.10(a)	Paragraphs 3.14(a) and 3.15	

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based on the level of assurance to be provided and the practitioner's consideration of (a) the nature and materiality of the information to be tested to the subject matter or the assertion taken as a whole, (b) the likelihood of misstatements, (c) knowledge obtained during current and previous engagements, (d) the responsible party's competence in the subject matter, (e) the extent to which the information is affected by the asserter's judgment, and (f) inadequacies in the responsible party's underlying data.		Paragraphs 2.10(c), 2.14, and 2.16		
.58 As part of the attestation procedures, the practitioner considers the written assertion ordinarily provided by the responsible party. If a written assertion cannot be obtained from the responsible party, the practitioner should consider the effects on his or her ability to obtain sufficient evidence to form a conclusion about the subject matter. When the practitioner's client is the responsible party, a failure to obtain a written assertion should result in the practitioner concluding that a scope limitation exists. fn. 11 When the practitioner's client is not the responsible party and a written assertion is not provided, the practitioner may be able to conclude that he or she has sufficient evidence to form a conclusion about the subject matter.		This requirement was not carried forward because paragraph 2.8 requires the practitioner to obtain a written assertion in an examination engagement. Paragraph 2.57. If the responsible party does not provide an assertion, a scope limitation exists.	This requirement was not carried forward because paragraph 3.11 requires the practitioner to obtain a written assertion in a review engagement. Paragraph 3.46 If the responsible party does not provide an assertion, a scope limitation exists and the practitioner should withdraw from the engagement.	
.60 Written representations from the responsible party ordinarily confirm representations explicitly or implicitly given to the practitioner, indicate and document		Obtaining representations is not a requirement in AT section 101, <i>Attest Engagements</i> (AICPA,	Obtaining representations is not a requirement in AT section 101. Paragraph 3.32 of the proposed	

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<p>the continuing appropriateness of such representations, and reduce the possibility of misunderstanding concerning the matters that are the subject of the representations. Accordingly, in an examination or a review engagement, a practitioner should consider obtaining a representation letter from the responsible party. Examples of matters that might appear in such a representation letter include the following: fn. 12</p> <p>a. A statement acknowledging responsibility for the subject matter and, when applicable, the assertion</p> <p>b. A statement acknowledging responsibility for selecting the criteria, where applicable</p> <p>c. A statement acknowledging responsibility for determining that such criteria are appropriate for its purposes, where the responsible party is the client</p> <p>d. The assertion about the subject matter based on the criteria selected</p> <p>e. A statement that all known matters contradicting the assertion and any communication from regulatory agencies affecting the subject matter or the assertion have been disclosed to the practitioner</p> <p>f. Availability of all records relevant to the subject matter</p>		<p><i>Professional Standards</i>). Paragraph 2.41 of the proposed SSAE requires the practitioner to obtain written representations and specifies the representations that should be obtained.</p> <p>Paragraph 2.41(c)</p> <p>Paragraph 2.41(c)(ii)</p> <p>Paragraph 2.41(c)(iii)</p> <p>Paragraph 2.41(a)</p> <p>Paragraph 2.41(b)</p> <p>Paragraph 2.41(e)</p> <p>Paragraph 2.41(d)</p>	<p>SSAE requires the practitioner to obtain written representations and specifies the representations that should be obtained.</p> <p>Paragraph 3.32(c)(i)</p> <p>Paragraph 3.32(c)(ii)</p> <p>Paragraph 3.32(c)(iii)</p> <p>Paragraph 3.32(a)</p> <p>Paragraph 3.32(b)</p> <p>Paragraph 3.32(e)</p>	

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g. A statement that any known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter (or, if applicable, the assertion) have been disclosed to the practitioner		Paragraph 2.41(h)(iii)	Paragraph 3.32(d)	
h. Other matters as the practitioner deems appropriate			Paragraph 3.32(g)(iii)	
.61 When the client is not the responsible party, the practitioner should consider obtaining a letter of written representations from the client as part of the attest engagement. Examples of matters that might appear in such a representation letter include the following		Paragraph 2.42 This is a requirement in the proposed SSAE.	Paragraph 3.33 This is a requirement in the proposed SSAE.	
a. A statement that any known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter (or, if applicable, the assertion) have been disclosed to the practitioner		Paragraph 2.42(a)(iv)	Paragraph 3.33(a)(iv)	
b. A statement acknowledging the client's responsibility for selecting the criteria, where applicable		Paragraph 2.42(a)(i)	Paragraph 3.33(a)(i)	
c. A statement acknowledging the client's responsibility for determining that such criteria are appropriate for its purposes		Paragraph 2.42(a)(ii)	Paragraph 3.33(a)(ii)	
d. Other matters as the practitioner deems appropriate.		Paragraph 2.42(a)(iv)	Paragraph 3.33(a)(vi)	
.62 If the responsible party or the client refuses to furnish all written representations that the practitioner deems		When the engaging party is the responsible party and does not provide one or	When the engaging party is the responsible party and does not provide one	

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necessary, the practitioner should consider the effects of such a refusal on his or her ability to issue a conclusion about the subject matter. If the practitioner believes that the representation letter is necessary to obtain sufficient evidence to issue a report, the responsible party's or the client's refusal to furnish such evidence in the form of written representations constitutes a limitation on the scope of an examination sufficient to preclude an unqualified opinion and is ordinarily sufficient to cause the practitioner to disclaim an opinion or withdraw from an examination engagement. However, based on the nature of the representations not obtained or the circumstances of the refusal, the practitioner may conclude, in an examination engagement, that a qualified opinion is appropriate. Further, the practitioner should consider the effects of the refusal on his or her ability to rely on other representations. When a scope limitation exists in a review engagement, the practitioner should withdraw from the engagement. (See paragraph .75.)		<p>more written representations:</p> <ul style="list-style-type: none"> Paragraph 2.45 directs the practitioner to discuss the matter with the appropriate party, reevaluate the integrity of those from whom the representations were obtained, or take appropriate action. Paragraph 2.A63 precludes an unqualified opinion and indicates that the refusal to provide representations may be sufficient to cause the practitioner to withdraw from the engagement. <p>When the engaging party is different than the responsible party and the responsible party does not provide written representations:</p> <ul style="list-style-type: none"> Paragraph 2.46(a) of the proposed 	<p>or more written representations:</p> <ul style="list-style-type: none"> Paragraph 3.36 directs the practitioner to discuss the matter with the appropriate party, reevaluate the integrity of those from whom the representations were obtained, or take appropriate action. <p>When the engaging party is different than the responsible party and the responsible party does not provide one or more written representations:</p> <ul style="list-style-type: none"> Paragraph 3.37(a) of the proposed SSAE directs the practitioner to obtain oral responses from the responsible party regarding the matters in 	

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(a)	(b)	(c)	(d)	(e)
		<p>SSAE directs the practitioner to obtain oral responses from the responsible party regarding the matters in paragraph 2.41. If the responsible party provides satisfactory responses, the practitioner would not be precluded from issuing an unqualified opinion. However, use of the report would be restricted.</p> <ul style="list-style-type: none"> Paragraph 2.46(b) states that if the responsible party refuses to provide written representations or satisfactory oral responses regarding the matters in paragraph 2.41, a scope limitation exists. 	<p>paragraph 3.32. If the responsible party provides satisfactory responses, the practitioner would not be precluded from issuing an unqualified opinion. However, use of the report would be restricted.</p> <ul style="list-style-type: none"> Paragraph 3.37(b) states that if the responsible party refuses to provide written representations or satisfactory oral responses regarding the matters in paragraph 3.32, a scope limitation exists and the practitioner should withdraw from the engagement. 	
.63 The first standard of reporting is— The practitioner must identify the subject		Paragraph 2.52(c) and 2.52(g)	Paragraph 3.43(c) and 3.43(f)(iii)	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>matter or the assertion being reported on and state the character of the engagement in the report.</p> <p>(.65) The statement of the character of an attest engagement includes the following two elements: (a) a description of the nature and scope of the work performed and (b) a reference to the professional standards governing the engagement. The terms examination and review should be used to describe engagements to provide, respectively, a high level and a moderate level of assurance...)</p> <p>.</p>				
<p>.64 The practitioner who accepts an attest engagement should issue a report on the subject matter or the assertion or withdraw from the attest engagement. If the practitioner is reporting on the assertion, the assertion should be bound with or accompany the practitioner’s report or the assertion should be clearly stated in the practitioner’s report. fn. 14</p>		<p>Paragraph 2.3 of the proposed SSAE states, in part, that the objective of the proposed SSAE is to express as opinion in a written report.</p> <p>Paragraph 2.51</p>	<p>Paragraph 3.3 of the proposed SSAE states, in part, that the objective of the proposed SSAE is to express a conclusion in a written report.</p> <p>Paragraph 3.42</p>	
<p>.65 The statement of the character of an attest engagement includes the following two elements: (a) a description of the nature and scope of the work performed and (b) a reference to the professional standards governing the engagement. The terms examination and review should be used to describe engagements to provide, respectively, a high level and a moderate level of assurance. The reference to professional</p>		<p>The term <i>examination</i> is defined in paragraph 1.10(b)(i).</p>	<p>The term <i>review</i> is defined in paragraph 1.9(b)(ii).</p>	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
standards should be accomplished by referring to “attestation standards established by the American Institute of Certified Public Accountants.”		Paragraph 2.52(f)(i)	Paragraph 3.43(f)(iii)	
<p>.66 The second standard of reporting is—The practitioner must state the practitioner’s conclusion about the subject matter or the assertion in relation to the criteria against which the subject matter was evaluated in the report. However, if conditions exist that, individually or in combination, result in one or more material misstatements or deviations from the criteria, the practitioner should modify the report and, to most effectively communicate with the reader of the report, should ordinarily express his or her conclusion directly on the subject matter, fn. 15 not on the assertion.</p> <p>fn. 15. Specific standards may require that the practitioner express his or her conclusion directly on the subject matter. For example, if management states in its assertion that a material weakness exists in the entity’s internal control over financial reporting, the practitioner should state his or her opinion directly on the effectiveness of internal control, not on management’s assertion related thereto</p>	Paragraph 1.12	<p>Paragraph 2.52(h)</p> <p>Paragraph 2.55</p> <p>Paragraph 2.59</p>	<p>Paragraph 3.43(g)</p> <p>Paragraph 3.47. “The practitioner should consider whether modification of the report is adequate to disclose the misstatement of the subject matter.”</p> <p>Paragraph 3.49</p>	
.67 The practitioner should consider the concept of materiality in applying this standard. In expressing a conclusion, the practitioner should consider an omission or a misstatement to be material if the omission or misstatement—individually or		<p>Paragraphs 2.14–2.15</p> <p>Paragraph 2.A13</p>	<p>Paragraph 3.14</p> <p>Paragraph 3.A13</p>	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
when aggregated with others—is such that a reasonable person would be influenced by the omission or misstatement. The practitioner should consider both qualitative and quantitative aspects of omissions and misstatements.		Paragraph 2.A12	Paragraph 3.A11	
.68 The term general use applies to attest reports that are not restricted to specified parties. General-use attest reports should be limited to two levels of assurance: one based on a restriction of attestation risk to an appropriately low level (an examination) and the other based on a restriction of attestation risk to a moderate level (a review). In an engagement to achieve a high level of assurance (an examination), the practitioner’s conclusion should be expressed in the form of an opinion. When attestation risk has been restricted only to a moderate level (a review), the conclusion should be expressed in the form of negative assurance.	Paragraph 1.10(<i>l</i>) Definitions of <i>examination</i> and <i>review</i> in paragraph 1.10(<i>b</i>).	Wording for the examination opinion is in paragraph 2.55(<i>h</i>).	Wording for the review report conclusion is in paragraph 3.43(<i>g</i>).	Requirement to restrict the use of an agreed-upon procedures report: is in paragraphs 4.9(<i>e</i>) and 4.27.
.69 A practitioner may report on subject matter or an assertion at multiple dates or covering multiple periods during which criteria have changed (for example, a report on comparative information). In those circumstances, the practitioner should determine whether the criteria are clearly stated or described for each of the dates or periods, and whether the changes have been adequately disclosed.		Now application guidance in paragraph 2.A75.	Now application guidance in paragraph 3.A52.	
.70 If the criteria used for the subject matter for the current date or period differ from those criteria used for the subject matter for a preceding date or period and the subject matter for the prior date or				

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(a)	(b)	(c)	(d)	(e)
period is not presented, the practitioner should consider whether the changes in criteria are likely to be significant to users of the report. If so, the practitioner should determine whether the criteria are clearly stated or described and the fact that the criteria have changed is disclosed. (See paragraphs .76 and .77.)		Now application guidance in paragraph 2.A75.	Now application guidance in paragraph 3.A52.	
.71 The third standard of reporting is—The practitioner must state all of the practitioner’s significant reservations about the engagement, the subject matter, and, if applicable, the assertion related thereto in the report.		Paragraph 2.52(h)	Paragraph 3.43(g)	
.72 Reservations about the engagement refers to any unresolved problem that the practitioner had in complying with these attestation standards, interpretive standards, or the specific procedures agreed to by the specified parties. The practitioner should not express an unqualified conclusion unless the engagement has been conducted in accordance with the attestation standards. Such standards will not have been complied with if the practitioner has been unable to apply all the procedures that he or she considers necessary in the circumstances.		Paragraph 2.57	Paragraph 3.46 requires the practitioner to withdraw from the engagement when a scope limitation exists.	
.73 Restrictions on the scope of an engagement, whether imposed by the client or by such other circumstances as the timing of the work or the inability to obtain sufficient evidence, may require the practitioner to qualify the assurance provided, to disclaim any assurance, or to withdraw from the engagement. For example, if the practitioner’s client is the		Paragraph 2.57.	Chapter 3 of the proposed SSAE requires	

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(a)	(b)	(c)	(d)	(e)
responsible party, a failure to obtain a written assertion should result in the practitioner concluding that a scope limitation exists. (See paragraph .58.)			the practitioner to obtain a written assertion as a condition of engagement performance.	
.74 The practitioner's decision to provide a qualified opinion, to disclaim an opinion, or to withdraw because of a scope limitation in an examination engagement depends on an assessment of the effect of the omitted procedure(s) on his or her ability to express assurance. This assessment will be affected by the nature and magnitude of the potential effects of the matters in question, and by their significance to the subject matter or the assertion. If the potential effects are pervasive to the subject matter or the assertion, a disclaimer or withdrawal is more likely to be appropriate. When restrictions that significantly limit the scope of the engagement are imposed by the client or the responsible party, the practitioner generally should disclaim an opinion or withdraw from the engagement. The reasons for a qualification or disclaimer should be described in the practitioner's report.		Paragraph 2.57 states the practitioner also may qualify the opinion. Paragraph 2.A97(c) Paragraph 2.52(h)		
.75 In a review engagement, when the practitioner is unable to perform the inquiry and analytical or other procedures he or she considers necessary to achieve the limited assurance contemplated by a review, or when the client is the responsible party and does not provide the practitioner with a written assertion, the review will be incomplete. A review that is incomplete is not an adequate basis for issuing a review report and, accordingly,			Paragraph 3.46	

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(a)	(b)	(c)	(d)	(e)
the practitioner should withdraw from the engagement.				
<p>.78 The fourth standard of reporting is—The practitioner must state in the report that the report is intended solely for the information and use of the specified parties under the following circumstances:</p> <ul style="list-style-type: none"> When the criteria used to evaluate the subject matter are determined by the practitioner to be appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria When the criteria used to evaluate the subject matter are available only to specified parties When reporting on subject matter and a written assertion has not been provided by the responsible party When the report is on an attestation engagement to apply agreed-upon procedures to the subject matter 		<p>Paragraph 2.52(<i>l</i>)</p> <p>Paragraph 2.52(<i>l</i>)(i)</p> <p>Paragraph 2.52(<i>l</i>)(ii)</p> <p>No longer applicable because of the requirement to obtain an assertion.</p>	<p>Paragraph 3.43(<i>h</i>)</p> <p>Paragraph 3.43(<i>h</i>)(i)</p> <p>Paragraph 3.43(<i>h</i>)(ii)</p> <p>No longer applicable because of the requirement to obtain an assertion.</p>	<p>Paragraph 4.25(<i>l</i>)</p>
.79 The need for restriction on the use of a report may result from a number of circumstances, including the purpose of the report, the criteria used in preparation of the subject matter, the extent to which the procedures performed are known or understood, and the potential for the report to be misunderstood when taken out of the context in which it was intended to be used. A practitioner should consider		Now application guidance	Now application guidance	

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(a)	(b)	(c)	(d)	(e)
informing his or her client that restricted-use reports are not intended for distribution to nonspecified parties, regardless of whether they are included in a document containing a separate general-use report. fn. 16 fn. 17 However, a practitioner is not responsible for controlling a client's distribution of restricted-use reports. Accordingly, a restricted-use report should alert readers to the restriction on the use of the report by indicating that the report is not intended to be and should not be used by anyone other than the specified parties.		in paragraph 2.A89. Paragraph 2.52(i)	in paragraph 3.A61. Paragraph 3.43(h)(iii)	
.80 An attest report that is restricted as to use should contain a separate paragraph at the end of the report that includes the following elements: a. A statement indicating that the report is intended solely for the information and use of the specified parties b. An identification of the specified parties to whom use is restricted c. A statement that the report is not intended to be and should not be used by anyone other than the specified parties An example of such a paragraph is the following. This report is intended solely for the information and use of [the specified parties] and is not intended to be and should not be used by anyone other than these specified parties.		Paragraph 2.52(i) The location of the paragraph within the report is not prescribed.	Paragraph 3.42(h)(iii) The location of the paragraph within the report is not prescribed.	Paragraph 4.25(l) The location of the paragraph within the report is not prescribed.
.82 If a practitioner issues a single combined report covering both (a) subject matter or presentations that require a				

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(a)	(b)	(c)	(d)	(e)
restriction on use to specified parties and (b) subject matter or presentations that ordinarily do not require such a restriction, the use of such a single combined report should be restricted to the specified parties.		<p>The proposed SSAE does not require that use of the combined report be restricted.</p> <p>Now application guidance in paragraph 2.A87.</p>	<p>The proposed SSAE does not require that the combined report be restricted.</p> <p>Now application guidance in paragraph 3.A59.</p>	
.84 When expressing an opinion, the practitioner should clearly state whether, in his or her opinion, (a) the subject matter is based on (or in conformity with) the criteria in all material respects or (b) the assertion is presented (or fairly stated), in all material respects, based on the criteria. Reports expressing an opinion may be qualified or modified for some aspect of the subject matter, the assertion or the engagement (see the third reporting standard). However, as stated in paragraph .66, if conditions exist that, individually or in combination, result in one or more material misstatements or deviations from the criteria, the practitioner should modify the report and, to most effectively communicate with the reader of the report, should ordinarily express his or her conclusion directly on the subject matter, not on the assertion. In addition, such reports may emphasize certain matters relating to the attest engagement, the subject matter, or the assertion. The form of the practitioner’s report will depend on whether the practitioner opines on the subject matter or the assertion.		<p>Paragraph 2.52(h)</p> <p>Paragraph 2.55(b)</p> <p>Paragraph 2.59. The requirement in AT section 101 is “should ordinarily express.” The proposed SSAE states “should express.”</p>	<p>Paragraph 3.47. “The practitioner should consider whether modification of the report is adequate to disclose the misstatement of the subject matter.”</p> <p>Paragraph 3.49. The requirement in AT section 101 is “should ordinarily express.” The proposed</p>	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements"	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements"	Requirements in Column (a) That Are in Chapter 3, "Review Engagements"	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements"
(a)	(b)	(c)	(d)	(e)
			SSAE states "should report directly on the subject matter."	
<p>.85 The practitioner's examination report on subject matter should include the following:</p> <p>a. A title that includes the word independent</p> <p>b. An identification of the subject matter and the responsible party</p> <p>c. A statement that the subject matter is the responsibility of the responsible party</p> <p>d. A statement that the practitioner's responsibility is to express an opinion on the subject matter based on his or her examination</p> <p>e. A statement that the examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, and, accordingly, included procedures that the practitioner considered necessary in the circumstances</p> <p>f. A statement that the practitioner believes the examination provides a reasonable basis for his or her opinion</p> <p>g. The practitioner's opinion on whether the subject matter is based on (or in</p>		<p>Paragraph 2.52</p> <p>Paragraph 2.52(a)</p> <p>Paragraph 2.52(c) and 2.52(e)(i)</p> <p>Paragraph 2.52(e)(i)</p> <p>Paragraph 2.52(e)(ii)</p> <p>Paragraph 2.52(f)(i) does not require the report to state "included procedures that the practitioner considered necessary in the circumstances."</p> <p>Paragraph 2.52(f)(iii)</p> <p>Paragraph 2.52(h)</p>		

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>conformity with) the criteria in all material respects</p> <p>h. A statement restricting the use of the report to specified parties under the following circumstances (see paragraphs .78 to .83):</p> <p>(1) When the criteria used to evaluate the subject matter are determined by the practitioner to be appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria</p> <p>(2) When the criteria used to evaluate the subject matter are available only to the specified parties</p> <p>(3) When a written assertion has not been provided by the responsible party (The practitioner should also include a statement to that effect in the introductory paragraph of the report.)</p> <p>i. The manual or printed signature of the practitioner's firm</p> <p>j. The date of the examination report</p> <p>Appendix A [paragraph .114], Examination Reports, includes a standard examination report on subject matter. (See Example 1.)</p>		<p>Paragraph 2.52(i)</p> <p>Paragraph 2.52(i)(i)</p> <p>Paragraph 2.52(i)(ii)</p> <p>Item 85(h)(3) is not applicable because in the proposed SSAE an assertion is required. Failure to provide a written assertion would result in a scope limitation.</p> <p>Paragraph 2.52(j)</p> <p>Paragraph 2.52(l)</p> <p>Paragraph 2.105, example 1</p>		

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>.86 The practitioner’s examination report on an assertion should include the following:</p> <p>a. A title that includes the word independent</p> <p>b. An identification of the assertion and the responsible party (When the assertion does not accompany the practitioner’s report, the first paragraph of the report should also contain a statement of the assertion.)</p> <p>c. A statement that the assertion is the responsibility of the responsible party</p> <p>d. A statement that the practitioner’s responsibility is to express an opinion on the assertion based on his or her examination</p> <p>e. A statement that the examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, and, accordingly, included procedures that the practitioner considered necessary in the circumstances</p> <p>f. A statement that the practitioner believes the examination provides a reasonable basis for his or her opinion</p> <p>g. The practitioner’s opinion on whether the assertion is presented (or fairly stated), in all material respects, based on the criteria (However, see</p>		<p>Paragraph 2.52</p> <p>Paragraph 2.52(a)</p> <p>Paragraph 2.52(c)</p> <p>Paragraph 2.52(e)(i)</p> <p>Paragraph 2.52(e)(ii)</p> <p>Paragraph 2.52(f)(i) Does not require the report to state “included procedures that the practitioner considered necessary in the circumstances.”</p> <p>Paragraph 2.52(f)(iii)</p> <p>Paragraph 2.52(h)</p>		

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>paragraph .66.)</p> <p>h. A statement restricting the use of the report to specified parties under the following circumstances (see paragraphs .78 to .83):</p> <p>(1) When the criteria used to evaluate the subject matter are determined by the practitioner to be appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria</p> <p>(2) When the criteria used to evaluate the subject matter are available only to the specified parties</p> <p>i. The manual or printed signature of the practitioner’s firm</p> <p>j. The date of the examination report</p> <p>Appendix A [paragraph .114] includes a standard examination report on an assertion. (See Example 2.)</p>		<p>Paragraph 2.52(i)</p> <p>Paragraph 2.52(i)(i)</p> <p>Paragraph 2.52(i)(ii)</p> <p>Paragraph 2.52(j)</p> <p>Paragraph 2.52(l)</p> <p>Paragraph 2.105, example 2</p>		
<p>88 In a review report, the practitioner’s conclusion should state whether any information came to the practitioner’s attention on the basis of the work performed that indicates that (a) the subject matter is not based on (or in conformity with) the criteria or (b) the assertion is not presented (or fairly stated) in all material respects based on the criteria. (As discussed more fully in the</p>			Paragraph 3.43(g)	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
commentary to the third reporting standard, if the subject matter or the assertion is not modified to correct for any such information that comes to the practitioner's attention, such information should be described in the practitioner's report.)				
.89 The practitioner’s review report on subject matter should include the following: a. A title that includes the word independent b. An identification of the subject matter and the responsible party c. A statement that the subject matter is the responsibility of the responsible party d. A statement that the review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants e. A statement that a review is substantially less in scope than an examination, the objective of which is an expression of opinion on the subject matter, and accordingly, no such opinion is expressed f. A statement about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be based on (or in conformity with), in all material			Paragraph 3.43 Paragraph 3.43(a) Paragraph 3.43(c) and 3.43(e)(i) Paragraph 3.43(e)(i) Paragraph 3.43(f)(i) Paragraph 3.43(f)(iii) Paragraph 3.43(g)	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>respects, the criteria, other than those modifications, if any, indicated in his or her report</p> <p>g. A statement restricting the use of the report to specified parties under the following circumstances (see paragraphs .78 to .83):</p> <p>(1) When the criteria used to evaluate the subject matter are determined by the practitioner to be appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria</p> <p>(2) When the criteria used to evaluate the subject matter are available only to the specified parties</p> <p>(3) When a written assertion has not been provided by the responsible party and the responsible party is not the client (The practitioner should also include a statement to that effect in the introductory paragraph of the report.)</p> <p>h. The manual or printed signature of the practitioner’s firm</p> <p>i. The date of the review report</p> <p>Appendix B [paragraph .115], “Review Reports,” includes a standard review report on subject matter. (See Example 1.)</p>			<p>Paragraph 3.43(<i>h</i>)</p> <p>Paragraph 3.43(<i>h</i>)(i)</p> <p>Paragraph 3.43(<i>h</i>)(ii)</p> <p>No longer applicable because an assertion is required.</p> <p>Paragraph 3.43(<i>i</i>)</p> <p>Paragraph 3.43(<i>k</i>)</p> <p>Paragraph 3.A72, example 1</p>	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
Appendix B [paragraph .115] also includes a review report on subject matter that is the responsibility of a party other than client; the report is restricted as to use because a written assertion has not been provided by the responsible party. (See Example 2.)			Not included because a written assertion is required.	
<p>.90 The practitioner’s review report on an assertion should include the following:</p> <p>a. A title that includes the word independent</p> <p>b. An identification of the assertion and the responsible party (When the assertion does not accompany the practitioner’s report, the first paragraph of the report should also contain a statement of the assertion.)</p> <p>c. A statement that the assertion is the responsibility of the responsible party</p> <p>d. A statement that the review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants</p> <p>e. A statement that a review is substantially less in scope than an examination, the objective of which is an expression of opinion on the assertion, and accordingly, no such opinion is expressed</p> <p>f. A statement about whether the practitioner is aware of any material modifications that should be made to the</p>			<p>Paragraph 3.43</p> <p>Paragraph 3.43(a)</p> <p>Paragraph 3.43(c) and 3.43(e)(i)</p> <p>Paragraph 3.43(e)(i)</p> <p>Paragraph 3.43(f)(i)</p> <p>Paragraph 3.43(f)(iii)</p> <p>Paragraph 3.43(g)</p>	

Requirements in AT Sections 20, 50, 101, and 201 (a)	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements” (b)	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements” (c)	Requirements in Column (a) That Are in Chapter 3, “Review Engagements” (d)	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements” (e)
<p>assertion in order for it to be presented (or fairly stated), in all material respects, based on (or in conformity with) the criteria, other than those modifications, if any, indicated in his or her report (However, see paragraph .66.)</p> <p>g. A statement restricting the use of the report to specified parties under the following circumstances (see paragraphs .78 to .83):</p> <p>(1) When the criteria used to evaluate the subject matter are determined by the practitioner to be appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria</p> <p>(2) When the criteria used to evaluate the subject matter are available only to the specified parties</p> <p>h. The manual or printed signature of the practitioner’s firm</p> <p>i. The date of the review report</p> <p>Appendix B [paragraph .115] includes a review report on an assertion that is restricted as to use because the criteria are available only to the specified parties. (See Example 3.)</p>			<p>Paragraph 3.43(h)</p> <p>Paragraph 3.43(h)(i)</p> <p>Paragraph 3.43(h)(ii)</p> <p>Paragraph 3.43(i)</p> <p>Paragraph 3.43(k)</p> <p>Paragraph 3.A72, example 2.</p>	
.92 The practitioner’s responsibility with respect to other information in such a document does not extend beyond the				

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(a)	(b)	(c)	(d)	(e)
<p>information identified in his or her report, and the practitioner has no obligation to perform any procedures to corroborate any other information contained in the document. However, the practitioner should read the other information not covered by the practitioner's report or by the report of the other practitioner and consider whether it, or the manner of its presentation, is materially inconsistent with the information appearing in the practitioner's report. If the practitioner believes that the other information is inconsistent with the information appearing in the practitioner's report, he or she should consider whether the practitioner's report requires revision. If the practitioner concludes that the report does not require revision, he or she should request the client to revise the other information. If the other information is not revised to eliminate the material inconsistency, the practitioner should consider other actions, such as revising his or her report to include an explanatory paragraph describing the material inconsistency, withholding the use of his or her report in the document, or withdrawing from the engagement.</p> <p>.93 If, while reading the other information for the reasons set forth in paragraph .92, the practitioner becomes aware of information that he or she believes is a material misstatement of fact that is not a material inconsistency as described in paragraph .92, he or she should discuss the matter with the client. In connection with this discussion, the</p>		<p>Paragraph 2.47 requires the practitioner to read the other information.</p> <p>Paragraph 2.A64 provides the option of describing the material inconsistency in the examination report.</p> <p>Paragraph 2.47 requires the practitioner to discuss the matter with the responsible party and take further action, as appropriate.</p> <p>Further actions are listed in paragraph 2.A64; these actions do not include withholding the use of the report.</p> <p>Paragraph 2.47 requires</p>	<p>Paragraph 3.38 requires the practitioner to read the other information.</p> <p>Paragraph 3.A41 provides the option of describing the material inconsistency in the examination report.</p> <p>Paragraph 3.38 requires the practitioner to take further action, as appropriate.</p> <p>Further actions are listed in paragraph 3.A41; these actions do not include withholding the report.</p> <p>Paragraph 3.38 requires</p>	

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements"	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements"	Requirements in Column (a) That Are in Chapter 3, "Review Engagements"	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements"
(a)	(b)	(c)	(d)	(e)
practitioner should consider that he or she may not have the expertise to assess the validity of the statement, that there may be no standards by which to assess its presentation, and that there may be valid differences of judgment or opinion. If the practitioner concludes he or she has a valid basis for concern, the practitioner should propose that the client consult with some other party whose advice may be useful, such as the entity's legal counsel.		the practitioner to discuss the matter with the responsible party and to take further action, as appropriate. Further actions are listed in paragraph 2.A64.	the practitioner to discuss the matter with the responsible party and to take further action, as appropriate. Further actions are listed in paragraph 3.A41.	
.94 If, after discussing the matter, the practitioner concludes that a material misstatement of fact remains, the action taken will depend on his or her judgment in the circumstances. The practitioner should consider steps such as notifying the client's management and audit committee in writing of his or her views concerning the information and consulting his or her legal counsel about further action appropriate in the circumstances. fn. 19 19. If the client does not have an audit committee, the practitioner should communicate with individuals whose authority and responsibility are equivalent to those of an audit committee, such as the board of directors, the board of trustees, an owner in an owner-managed entity, or those who engaged the practitioner.	1.A12	Paragraph 2.49 requires the practitioner to take further action, as appropriate. Paragraph 2.A64 lists possible actions but does not include notifying management and the audit committee.	Paragraph 3.38 requires the practitioner to take further action, as appropriate. Paragraph 3.A41 lists possible actions but does not include notifying management and the audit committee.	
.95 Events or transactions sometimes occur subsequent to the point in time or period of time of the subject matter being tested but prior to the date of the				

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(a)	(b)	(c)	(d)	(e)
practitioner's report that have a material effect on the subject matter and therefore require adjustment or disclosure in the presentation of the subject matter or assertion. These occurrences are referred to as subsequent events. In performing an attest engagement, a practitioner should consider information about subsequent events that comes to his or her attention. Two types of subsequent events require consideration by the practitioner.		Paragraph 2.39 requires the practitioner to inquire about subsequent events.	Paragraph 3.30	
<p>.98 While the practitioner has no responsibility to detect subsequent events, the practitioner should inquire of the responsible party (and his or her client if the client is not the responsible party) as to whether they are aware of any subsequent events, through the date of the practitioner's report, that would have a material effect on the subject matter or assertion. fn. 20 If the practitioner has decided to obtain a representation letter, the letter ordinarily would include a representation concerning subsequent events. (See paragraphs .60 and .61.)</p> <p>fn.20. For certain subject matter, specific subsequent event standards have been developed to provide additional requirements for engagement performance and reporting. Additionally, a practitioner engaged to examine the design or effectiveness of internal control over items not covered by AT section 501, <i>An Examination of an Entity's Internal Control Over Financial Reporting That Is Integrated With an Audit of Its Financial</i></p>	Paragraph 1.12	Paragraph 2.39	No requirement to inquire. Now application guidance in paragraph 3.A34.	

Requirements in AT Sections 20, 50, 101, and 201 (a)	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements” (b)	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements” (c)	Requirements in Column (a) That Are in Chapter 3, “Review Engagements” (d)	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements” (e)
Statements, or AT section 601, <i>Compliance Attestation</i> , should consider the subsequent events guidance set forth in sections 501.129-.134 and 601.50-52.				
.100 The practitioner should prepare and maintain attest documentation, the form and content of which should be designed to meet the circumstances of the particular attest engagement. Attest documentation is the principal record of attest procedures applied, information obtained, and conclusions or findings reached by the practitioner in the engagement. The quantity, type, and content of attest documentation are matters of the practitioner’s professional judgment.	Paragraphs 1.33 and 1.35.	Paragraph 2.61	Paragraph 3.52	
101 Attest documentation serves mainly to: a. Provide the principal support for the practitioner’s report, including the representation regarding observance of the standards of fieldwork, which is implicit in the reference in the report to attestation standards. fn. 23 b. Aid the practitioner in the conduct and supervision of the attest engagement. For examinations of prospective financial statements, attest documentation ordinarily should indicate that the process by which the entity develops its prospective financial statements was considered in determining the scope of the examination.	Paragraph 1.12	Additional documentation requirements regarding documentation of examinations of prospective financial statements will be included in chapter 6, “Financial Forecasts and Projections.”		

Requirements in AT Sections 20, 50, 101, and 201 (a)	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements” (b)	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements” (c)	Requirements in Column (a) That Are in Chapter 3, “Review Engagements” (d)	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements” (e)
fn.23 However, there is no intention to imply that the practitioner would be precluded from supporting his or her report by other means in addition to attest documentation				
.103 Attest documentation should be sufficient to (a) enable members of the engagement team with supervision and review responsibilities to understand the nature, timing, extent, and results of attest procedures performed, and the information obtained fn. 24 and (b) indicate the engagement team member(s) who performed and reviewed the work. fn. 24 A firm of practitioners has a responsibility to adopt a system of quality control policies and procedures to provide the firm with reasonable assurance that its personnel comply with applicable professional standards, including attestation standards, and the firm's standards of quality in conducting individual attest engagements. Review of attest documentation and discussions with engagement team members are among the procedures a firm performs when monitoring compliance with the quality control policies and procedures that it has established. (Also, see paragraphs .17 and .18.)	Paragraph 1.6	Paragraph 2.64 Paragraph 2.A103	Paragraph 3.52 Paragraph 3.A70	
.104 Attest documentation is the property of the practitioner, and some states recognize this right of ownership in their statutes. The practitioner should adopt reasonable procedures to retain attest documentation for a period of time sufficient to meet the needs of his or her	Paragraph 1.36			

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements"	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements"	Requirements in Column (a) That Are in Chapter 3, "Review Engagements"	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements"
(a)	(b)	(c)	(d)	(e)
practice and to satisfy any applicable legal or regulatory requirements for records retention. fn. 25 [fn. 26]				
.105 The practitioner has an ethical, and in some situations a legal, obligation to maintain the confidentiality of client information or information of the responsible party. fn. 27 Because attest documentation often contains confidential information, the practitioner should adopt reasonable procedures to maintain the confidentiality of that information. fn. † † See the attestation interpretation, "Providing Copies of Attest Documentation to a Regulator." 9101.43–.46	Paragraph 1.37 This will remain an interpretation of the SSAEs.			
.106 The practitioner also should adopt reasonable procedures to prevent unauthorized access to attest documentation.	Paragraph 1.38			
107 Certain attest documentation may sometimes serve as a useful reference source for the client, but it should not be regarded as a part of, or a substitute for, the client's records.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.
110 When the practitioner determines that an attest service is to be provided as part of a consulting service engagement, the practitioner should inform the client of the relevant differences between the two types of services and obtain concurrence that the attest service is to be performed in accordance with the appropriate professional requirements. The practitioner should take such actions because the professional requirements for an attest service differ from those for a consulting service engagement.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
.111 The practitioner should issue separate reports on the attest engagement and the consulting service engagement and, if presented in a common binder, the report on the attest engagement or service should be clearly identified and segregated from the report on the consulting service engagement.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.	Not included in the proposed SSAE.
AT Section 201 .01 This section sets forth attestation standards and provides guidance to a practitioner concerning performance and reporting in all agreed-upon procedures engagements, except as noted in paragraph .02. A practitioner also should refer to the following sections of this Statement on Standards for Attestation Engagements (SSAE), which provide additional guidance for certain types of agreed-upon procedures engagements: a. Section 301, Financial Forecasts and Projections b. Section 601, Compliance Attestation	Paragraph 1.12			
.03 An agreed-upon procedures engagement is one in which a practitioner is engaged by a client to issue a report of findings based on specific procedures performed on subject matter. The client engages the practitioner to assist specified parties in evaluating subject matter or an assertion as a result of a need or needs of the specified parties. fn. 2 Because the specified parties require that findings be independently derived, the services of a practitioner are obtained to perform				

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(a)	(b)	(c)	(d)	(e)
procedures and report his or her findings. The specified parties and the practitioner agree upon the procedures to be performed by the practitioner that the specified parties believe are appropriate. Because the needs of the specified parties may vary widely, the nature, timing, and extent of the agreed-upon procedures may vary as well; consequently, the specified parties assume responsibility for the sufficiency of the procedures since they best understand their own needs. In an engagement performed under this section, the practitioner does not perform an examination or a review, as discussed in section 101, and does not provide an opinion or negative assurance. fn. 3 (See paragraph .24.) Instead, the practitioner's report on agreed-upon procedures should be in the form of procedures and findings. (See paragraph .31.)				Paragraph 4.19
.04 As a consequence of the role of the specified parties in agreeing upon the procedures performed or to be performed, a practitioner's report on such engagements should clearly indicate that its use is restricted to those specified parties. fn. 4 Those specified parties, including the client, are hereinafter referred to as specified parties.				Paragraph 4.25(l)
.05 The general, fieldwork, and reporting standards for attestation engagements as established in section 50, <i>SSAE Hierarchy</i> , together with interpretive guidance regarding their application as addressed throughout this section, should	Paragraph 1.12			Paragraph 4.8

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
be followed by the practitioner in performing and reporting on agreed-upon procedures engagements.				
<p>07 To satisfy the requirements that the practitioner and the specified parties agree upon the procedures performed or to be performed and that the specified parties take responsibility for the sufficiency of the agreed-upon procedures for their purposes, ordinarily the practitioner should communicate directly with and obtain affirmative acknowledgment from each of the specified parties. For example, this may be accomplished by meeting with the specified parties or by distributing a draft of the anticipated report or a copy of an engagement letter to the specified parties and obtaining their agreement. If the practitioner is not able to communicate directly with all of the specified parties, the practitioner may satisfy these requirements by applying any one or more of the following or similar procedures.</p> <ul style="list-style-type: none"> • Compare the procedures to be applied to written requirements of the specified parties. • Discuss the procedures to be applied with appropriate representatives of the specified parties involved. • Review relevant contracts with or correspondence from the specified parties. The practitioner should not report on an engagement when specified parties do not agree upon the procedures performed or to be performed and do not take responsibility for the sufficiency of the procedures for their purposes. (See paragraph .36 for guidance on satisfying 				<p>Now application guidance in paragraph 4.A4.</p> <p>Paragraph 4.10</p>

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
these requirements when the practitioner is requested to add other parties as specified parties after the date of completion of the agreed-upon procedures.)				
.08 The subject matter of an agreed-upon procedures engagement may take many different forms and may be at a point in time or covering a period of time. In an agreed-upon procedures engagement, it is the specific subject matter to which the agreed-upon procedures are to be applied using the criteria selected. Even though the procedures are agreed upon between the practitioner and the specified parties, the subject matter and the criteria must meet the conditions set forth in the third general standard. (See section 101.23 and .24.) The criteria against which the specific subject matter needs to be measured may be recited within the procedures enumerated or referred to in the practitioner’s report.	Paragraph 1.25(b)(i–ii)			
.10 The practitioner should establish an understanding with the client regarding the services to be performed. When the practitioner documents the understanding through a written communication with the client (an engagement letter), such communication should be addressed to the client, and in some circumstances also to all specified parties. Matters that might be included in such an understanding include the following: <ul style="list-style-type: none"> • The nature of the engagement • Identification of the subject matter (or the assertion related thereto), the 	Paragraph 1.27(c)(i–ii)	Paragraphs 2.5–2.6 The proposed SSAE does not state who the communication should be addressed to.		Paragraphs 4.11–4.12 Paragraph .10 of AT section 201, <i>Agreed-Upon Procedures Engagements</i> (AICPA, <i>Professional Standards</i>), lists the elements but does not require these elements; in the proposed SSAE the elements in paragraph 4.12 are upgraded to a requirement to be consistent with paragraphs 2.6 and 3.9.

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(a)	(b)	(c)	(d)	(e)
<p>responsible party, and the criteria to be used</p> <ul style="list-style-type: none"> • Identification of specified parties (See paragraph .36.) • Specified parties' acknowledgment of their responsibility for the sufficiency of the procedures • Responsibilities of the practitioner (See paragraphs .12 to .14 and .40.) • Reference to attestation standards established by the American Institute of Certified Public Accountants (AICPA) • Agreement on procedures by enumerating (or referring to) the procedures (See paragraphs .15 to .18.) • Disclaimers expected to be included in the practitioner's report • Use restrictions • Assistance to be provided to the practitioner (See paragraphs .22 and .23.) • Involvement of a specialist (See paragraphs .19 to .21.) • Agreed-upon materiality limits (See paragraph .25.) 				
<p>.13 The practitioner should have adequate knowledge in the specific subject matter to which the agreed-upon procedures are to be applied. He or she may obtain such knowledge through formal or continuing education, practical experience, or consultation with others. fn. 5</p> <p>Fn. 5 Section 601.19 and .20 provide guidance about obtaining an understanding of certain requirements in an agreed-upon procedures engagement</p>	<p>Paragraph 1.30(a–b)</p> <p>Paragraph 1.12</p>			

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(a)	(b)	(c)	(d)	(e)
on compliance.				
15 The procedures that the practitioner and specified parties agree upon may be as limited or as extensive as the specified parties desire. However, mere reading of an assertion or specified information about the subject matter does not constitute a procedure sufficient to permit a practitioner to report on the results of applying agreed-upon procedures. In some circumstances, the procedures agreed upon evolve or are modified over the course of the engagement. In general, there is flexibility in determining the procedures as long as the specified parties acknowledge responsibility for the sufficiency of such procedures for their purposes. Matters that should be agreed upon include the nature, timing, and extent of the procedures.				Paragraph 4.12(g)
.16 The practitioner should not agree to perform procedures that are overly subjective and thus possibly open to varying interpretations. Terms of uncertain meaning (such as general review, limited review, check, or test) should not be used in describing the procedures unless such terms are defined within the agreed-upon procedures. The practitioner should obtain evidential matter from applying the agreed-upon procedures to provide a reasonable basis for the finding or findings expressed in his or her report, but need not perform additional procedures outside the scope of the engagement to gather additional evidential matter.				Paragraph 4.14 Paragraph 4.A20 Paragraph 4.15
.20 The practitioner and the specified				Paragraph 4.16

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements"	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements"	Requirements in Column (a) That Are in Chapter 3, "Review Engagements"	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements"
(a)	(b)	(c)	(d)	(e)
parties should explicitly agree to the involvement of the specialist in assisting a practitioner in the performance of an agreed-upon procedures engagement. This agreement may be reached when obtaining agreement on the procedures performed or to be performed and acknowledgment of responsibility for the sufficiency of the procedures, as discussed in paragraph .07. The practitioner's report should describe the nature of the assistance provided by the specialist.				Paragraph 4.17
22. The agreed-upon procedures to be enumerated or referred to in the practitioner's report are to be performed entirely by the practitioner except as discussed in paragraphs .19 to .21. fn. 7 However, internal auditors or other personnel may prepare schedules and accumulate data or provide other information for the practitioner's use in performing the agreed-upon procedures. Also, internal auditors may perform and report separately on procedures that they have carried out. Such procedures may be similar to those that a practitioner may perform under this section				Paragraph 4.18 Now states, "The agreed-upon procedures... should be performed entirely by the engagement team or other practitioners."
24 A practitioner should present the results of applying agreed-upon procedures to specific subject matter in the form of findings. The practitioner should not provide negative assurance about whether the subject matter or the assertion is fairly stated based on the criteria. For example, the practitioner should not include a statement in his or her report that "nothing came to my attention that caused				Paragraph 4.19 Paragraph 4.20

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, "Concepts Common to All Attestation Engagements"	Requirements in Column (a) That Are in Chapter 2, "Examination Engagements"	Requirements in Column (a) That Are in Chapter 3, "Review Engagements"	Requirements in Column (a) That Are in Chapter 4, "Agreed-Upon Procedures Engagements"
(a)	(b)	(c)	(d)	(e)
me to believe that the [identify subject matter] is not presented based on [or the assertion is not fairly stated based on] [identify criteria]."				
.25 The practitioner should report all findings from application of the agreed-upon procedures. The concept of materiality does not apply to findings to be reported in an agreed-upon procedures engagement unless the definition of materiality is agreed to by the specified parties. Any agreed-upon materiality limits should be described in the practitioner's report.				Paragraph 4.21
26. The practitioner should avoid vague or ambiguous language in reporting findings. Examples of appropriate and inappropriate descriptions of findings resulting from the application of certain agreed-upon procedures follow.				Paragraph 4.22
.31 The practitioner's report on agreed-upon procedures should be in the form of procedures and findings. The practitioner's report should contain the following elements: a. A title that includes the word independent b. Identification of the specified parties (See paragraph .36.) c. Identification of the subject matter fn. 10 (or the written assertion related thereto) and the character of the engagement				Paragraph 4.25 Paragraph 4.25(a) Paragraph 4.25(d) Paragraph 4.25(c)

Requirements in AT Sections 20, 50, 101, and 201	Requirements in Column (a) That Are in Chapter 1, “Concepts Common to All Attestation Engagements”	Requirements in Column (a) That Are in Chapter 2, “Examination Engagements”	Requirements in Column (a) That Are in Chapter 3, “Review Engagements”	Requirements in Column (a) That Are in Chapter 4, “Agreed-Upon Procedures Engagements”
(a)	(b)	(c)	(d)	(e)
<p>d. Identification of the responsible party</p> <p>e. A statement that the subject matter is the responsibility of the responsible party</p> <p>f. A statement that the procedures performed were those agreed to by the specified parties identified in the report</p> <p>g. A statement that the agreed-upon procedures engagement was conducted in accordance with attestation standards established by the AICPA</p> <p>h. A statement that the sufficiency of the procedures is solely the responsibility of the specified parties and a disclaimer of responsibility for the sufficiency of those procedures</p> <p>i. A list of the procedures performed (or reference thereto) and related findings (The practitioner should not provide negative assurance—see paragraph .24.)</p> <p>j. Where applicable, a description of any agreed-upon materiality limits (See paragraph .25.)</p> <p>k. A statement that the practitioner was not engaged to and did not conduct an examination ^{fn. 11} ^{fn. 12} of the subject matter, the objective of which would be the expression of an opinion, a disclaimer of opinion on the subject matter, and a statement that if the practitioner had</p>				<p>Paragraph 4.25(f)</p> <p>Paragraph 4.25(g)</p> <p>Paragraph 4.25(e)</p> <p>Paragraph 4.25(k)(i)</p> <p>Paragraph 4.25(h)(i–ii)</p> <p>Paragraph 4.25(i)</p> <p>Paragraph 4.21</p> <p>Paragraph 4.25(k)(ii)</p>

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(a)	(b)	(c)	(d)	(e)
<p>performed additional procedures, other matters might have come to his or her attention that would have been reported fn. 13</p> <p>l. A statement of restrictions on the use of the report because it is intended to be used solely by the specified parties fn. 14</p> <p>m. Where applicable, reservations or restrictions concerning procedures or findings as discussed in paragraphs .33, .35, .39, and .40</p> <p>n. For an agreed-upon procedures engagement on prospective financial information, all items included in section 301.55</p> <p>o. Where applicable, a description of the nature of the assistance provided by a specialist as discussed in paragraphs .19 through .21</p> <p>p. The manual or printed signature of the practitioner’s firm</p> <p>q. The date of the report</p>	Paragraph 1.12			<p>Paragraph 4.25(<i>l</i>)</p> <p>Paragraph 4.25(<i>m</i>)</p> <p>Paragraph 4.25(<i>n</i>)</p> <p>Paragraph 4.25(<i>o</i>)</p> <p>Paragraph 4.25(<i>q</i>)</p>
.34 The date of completion of the agreed-upon procedures should be used as the date of the practitioner’s report.				Paragraph 4.25(<i>q</i>)
.35 When circumstances impose restrictions on the performance of the agreed-upon procedures, the practitioner				Paragraph 4.26

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(a)	(b)	(c)	(d)	(e)
<p>should attempt to obtain agreement from the specified parties for modification of the agreed-upon procedures. When such agreement cannot be obtained (for example, when the agreed-upon procedures are published by a regulatory agency that will not modify the procedures), the practitioner should describe any restrictions on the performance of procedures in his or her report or withdraw from the engagement.</p>				Paragraph 4.26
<p>.36 Subsequent to the completion of the agreed-upon procedures engagement, a practitioner may be requested to consider the addition of another party as a specified party (a nonparticipant party). The practitioner may agree to add a nonparticipant party as a specified party, based on consideration of such factors as the identity of the nonparticipant party and the intended use of the report. fn. 16 If the practitioner does agree to add the nonparticipant party, he or she should obtain affirmative acknowledgment, normally in writing, from the nonparticipant party agreeing to the procedures performed and of its taking responsibility for the sufficiency of the procedures. If the nonparticipant party is added after the practitioner has issued his or her report, the report may be reissued or the practitioner may provide other written acknowledgment that the nonparticipant party has been added as a specified party. If the report is reissued, the report date should not be changed. If the practitioner provides written acknowledgment that the</p>				<p>Paragraph 4.27</p> <p>Paragraph 4.28</p>

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(a)	(b)	(c)	(d)	(e)
nonparticipant party has been added as a specified party, such written acknowledgment ordinarily should state that no procedures have been performed subsequent to the date of the report.				Paragraph 4.29
.39 The responsible party's refusal to furnish written representations determined by the practitioner to be appropriate for the engagement constitutes a limitation on the performance of the engagement. In such circumstances, the practitioner should do one of the following. a. Disclose in his or her report the inability to obtain representations from the responsible party. b. Withdraw from the engagement. fn. 17 c. Change the engagement to another form of engagement.				Paragraph 4.23. The proposed SSAE does not include options. Item 39(c).
40 The practitioner need not perform procedures beyond the agreed-upon procedures. However, in connection with the application of agreed-upon procedures, if matters come to the practitioner's attention by other means that significantly contradict the subject matter (or written assertion related thereto) referred to in the practitioner's report, the practitioner should include this matter in his or her report. fn. 18 For example, if, during the course of applying agreed-upon procedures regarding an entity's internal control, the practitioner becomes aware of a material weakness by means other than performance of the agreed-upon procedure, the practitioner should include				Paragraph 4.30 Included as application guidance in paragraph 4.A31.

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(a)	(b)	(c)	(d)	(e)
this matter in his or her report.				
<p>.42 Before a practitioner who was engaged to perform another form of engagement agrees to change the engagement to an agreed-upon procedures engagement, he or she should consider the following:</p> <p>a. The possibility that certain procedures performed as part of another type of engagement are not appropriate for inclusion in an agreed-upon procedures engagement</p> <p>b. The reason given for the request, particularly the implications of a restriction on the scope of the original engagement or the matters to be reported</p> <p>c. The additional effort required to complete the original engagement</p> <p>d. If applicable, the reasons for changing from a general-use report to a restricted-use report</p>	<p>Paragraph 1.29 states that “the practitioner should not agree to a change in the terms of the engagement when no reasonable justification for doing so exists. If such a change is made, the practitioner should not disregard evidence that was obtained prior to the change.”</p> <p>Paragraph 1.A48</p>			The requirement to consider the factors listed in paragraph .42 of AT section 201 is not included in the proposed SSAE.
.44 In all circumstances, if the original engagement procedures are substantially complete or the effort to complete such procedures is relatively insignificant, the practitioner should consider the propriety of accepting a change in the engagement.				Not included in the proposed SSAE.
.45 If the practitioner concludes based on his or her professional judgment, that there is reasonable justification to change the engagement, and provided he or she complies with the standards applicable to agreed-upon procedures engagements, the practitioner should issue an				Not included in the proposed SSAE.

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(a)	(b)	(c)	(d)	(e)
appropriate agreed-upon procedures report. The report should not include reference to either the original engagement or performance limitations that resulted in the changed engagement. (See paragraph .40.)				