

Mr. James Gunn
Technical Director
International Auditing and Assurance Standards Board
545 Fifth Avenue, 14th Floor
New York, New York 10017
USA

30 September 2010

Dear Mr. Gunn:

Proposed ISAE 3420 – Assurance Reports on the Process to Compile Pro Forma Financial Information Included in a Prospectus

Ernst & Young Global Limited, the central entity of the Ernst & Young organization, welcomes the opportunity to offer its views on the proposed International Standard on Assurance Engagements (ISAE) 3420 *Assurance Reports on the Process to Compile Pro Forma Financial Information Included in a Prospectus*. Responses to the specific questions on which the IAASB is seeking feedback are set out in Section 1 below. Our other comments, including general editorial comments, are set out in Section 2.

We support the need for a standard on this topic, and believe that the proposed ISAE 3420 will help to promote increased consistency of reporting on the process of compiling pro forma information included in a prospectus. Although the Prospectus Regime in the European Union (EU) was used as the starting point for the preparation of the proposed IASE 3420, we believe that the resulting standard will also be useful in other jurisdictions.

1. Specific questions on which IAASB is seeking responses

1. *In relation to respondents' roles and responsibilities, would respondents adopt or apply the proposed ISAE, or request an engagement in accordance therewith, if it became effective? If not, please explain why (in this regard, respondents are asked to also consider question 4 below).*

We would apply the proposed standard in jurisdictions where it is acceptable to do so, such as for engagements in the EU that are required to follow the Prospectus Directive, or other jurisdictions where providing assurance on the process to compile pro forma financial information is either required or a generally accepted practice. We believe that it will assist practitioners in reporting on the process of compiling pro forma financial information for inclusion in a prospectus, as well as explaining to users of the pro forma information the scope of our work. In this regard, we believe that it will help to promote consistency of reporting across jurisdictions.

2. *Do respondents believe that the work effort set out in the proposed ISAE is sufficient and appropriate to enable the practitioner to express an opinion as to whether the process to compile the PFI has, in all material respects, been applied in accordance with the applicable criteria?*

In most respects, we believe that the work effort set out in the proposed standard is sufficient and appropriate.

However, we have some concerns about the work effort suggested by the proposed standard in circumstances when the source of the unadjusted financial information has not been audited or reviewed. In our view, the proposed work effort in these circumstances may be insufficient to give the practitioner sufficient evidence on which to make the determination that the source is appropriate.

Paragraph 17 requires the practitioner to determine whether the responsible party has used an appropriate source for the unadjusted financial information, and the application material (paragraph A32) suggests procedures that the practitioner *may* consider when making this determination. These procedures are:

- ▶ Inquiries of the responsible party and
- ▶ Comparison of the source with the corresponding period financial information and, as appropriate, immediately preceding annual or interim financial information, and discussing significant changes with the responsible party

Comparison of the source with other information, and discussion of significant changes with the responsible party suggests that the practitioner will perform some level of analytical procedures. However, by not using the same terminology as the ISAs, it is unclear whether the practitioner would be expected to perform procedures on the underlying data or perform procedures to corroborate the responses given by the responsible party for significant changes that the practitioner identifies and discusses with the responsible party. It would be helpful to clarify the minimum extent of inquiries and analytical (or other) procedures expected, perhaps by way of an example.

In addition, the implication in paragraph A32 of the use of “may” when describing the procedures that the practitioner may perform is that, although these procedures are to be considered, the practitioner may choose not to perform them. In our view, however, these procedures represent less than the minimum work effort that we would typically expect to be undertaken.

We believe that, in addition to the above suggested procedures, the practitioner should have regard to the findings of the immediately preceding annual or interim financial information, and whether these might indicate any issues with the process that the responsible party has applied in compiling the financial information. For example, if the practitioner had identified deficiencies in internal control during the previous audit engagement, the practitioner would need to consider whether these would affect the reliability and credibility of the source of the unadjusted financial information.

In addition, we believe that it will often be necessary to perform procedures to corroborate some or all of the information provided by the responsible party in response to the practitioner's inquiries, for example, if the responses are inconsistent with the practitioner's understanding of the entity or the external factors that influence the markets in which the entity operates.

3. *Do respondents believe that it is clear from the illustrative practitioner's report in the Appendix to the proposed ISAE that the practitioner is reporting on the process to compile the PFI and not on the PFI itself? Paragraph A52 of the proposed ISAE, in particular, provides two alternatives for the opinion in relation to the process, i.e.*

- ▶ *Whether the process to compile the PFI has, in all material respects, been applied in accordance with the applicable criteria; or*
- ▶ *Whether the PFI has been properly compiled on the basis stated.*

Yes, we believe that it is clear. However, because the two forms of the acceptable opinion are worded differently – and could therefore be interpreted by users as implying different levels of assurance – we believe that it is necessary to state explicitly within ISAE 3420 that the two phrases are regarded as being equivalent, similar to the explicit statement in paragraph 35 of ISA 700 *Forming an Opinion and Reporting on Financial Statements*.

4. *As the proposed ISAE is designed to convey assurance on the process to compile the PFI, do respondents believe that it would be desirable for the IAASB to also develop a separate standard on reporting on the PFI itself? If yes:*

- (a) *What do respondents believe would be the work effort implications in undertaking engagements to report on the PFI itself? In particular, how would such work effort differ from that specified in the proposed ISAE?*
- (b) *Should both reasonable assurance and limited assurance on the PFI be addressed? If so, how should the nature and extent of the practitioner's work effort be differentiated between a reasonable assurance engagement and a limited assurance engagement to report on the PFI?*

We believe that the development of a separate standard on reporting on the pro forma information itself should be driven by a clear demand for such an assurance service by users of the pro forma information, securities regulators or other stakeholders.

2. Other comments

2.1 Engagement acceptance

We believe that when profit forecasts are used as the basis of the pro forma adjustments, it would not be appropriate to accept the engagement to report on the process to compile the pro forma information. In these situations, the criteria would not be suitable or acceptable because the profit forecasts are not factually supportable. It should be made clear that such an engagement does not comply with this ISAE. Accordingly, we propose the following wording:

Requirement: “This ISAE requires that the pro forma adjustments are capable of being factually supported. Therefore, the practitioner shall not accept an engagement to report on the process to compile pro forma information included in a prospectus where the proposed adjustments are based on future anticipated outcomes related to profit forecasts.”

Related application material: “If profit forecasts are used as the basis for making the pro forma adjustments, such adjustments are not factually supportable. Such an engagement does not comply with this ISAE. Accordingly, the practitioner’s report on the process to compile pro forma financial information included in a prospectus does not include any reference to the engagement having been conducted in accordance with this ISAE.”

2.2 Clarity drafting conventions

We support the use of the clarity drafting conventions in the proposed ISAE 3420. However, we note a number of areas where we believe that the clarity of the drafting could be further improved.

2.2.1 Length and complexity of sentences

We note that a number of sentences within the proposed standard are long, and therefore may be difficult to understand. To improve the overall clarity of the standard, we suggest that these sentences be reworded and/or split into one or more shorter sentences. Examples of sentences longer than 45 words, along with our suggested changes to the wording, are set out in the annex to this letter.

There are also some instances of wording that we found to be complex. We believe that the proposed standard would benefit from simplification of the following wording:

- ▶ Paragraph 10(a): *Applicable criteria* – The criteria in accordance with which the process to compile the pro forma financial information is to be applied by the responsible party. We suggest amending this to read “*Applicable criteria* – The criteria used by the responsible party when applying the process to compile the pro forma information.”
- ▶ Paragraph A27, fifth bullet: We suggest simplifying the sentence, as follows “... such as monetary policies (including foreign exchange controls), fiscal policies, ...”

2.2.2 “Hidden” definitions

We note that the terms “properly compiled” (paragraph 5), “practitioner” (paragraph 1) and “professional accountant” (paragraph 1) are defined within the Introduction to the proposed ISAE 3420, whereas terms such as “pro forma financial information,” which are also used in the Introduction, are included within the Definitions section. In addition, “IESBA Code” (paragraph 7) has already been referred to in full in footnote 30, which could be confusing. For consistency, we believe that it would be helpful if the definitions for all defined terms were located within the Definitions section.

2.2.3 Inconsistent wording

In paragraph 12(b), the practitioner is required to “determine” that the applicable criteria are suitable. However, the sub-heading preceding paragraph 13 and paragraphs 13 and 14 require the practitioner to “assess” whether the applicable criteria are suitable. We suggest using “assess” in paragraph 12(b), for consistency.

In addition, the proposed standard refers to the “audit” report. This is inconsistent with ISA 700 *Forming an Opinion and Reporting on Financial Statements*, which refers to the “auditor’s report.” We suggest aligning the wording in the proposed standard with that used in ISA 700.

2.3 The practitioner’s report

The illustrative report is helpful, and we support its inclusion in the proposed standard. However, we have a number of comments regarding the drafting of the report.

Paragraph 31(g) requires that the practitioner include a summary of the practitioner’s procedures. The illustrative report addresses this requirement by presenting a listing of procedures that can be mapped to several of the requirements within the proposed standard. However, as the listing is a summary and states that “our procedures included”, users of the report may assume that the practitioner has also performed other procedures. This assumption, coupled with the use of similar wording to that of an auditor’s report in other parts of the practitioner’s report (including the use of “reasonable assurance”) may lead the user of the practitioner’s report to believe that the opinion is on the pro forma information, rather than on the process to compile the pro forma financial information, despite wording to the contrary in the practitioner’s report.

The description of procedures set out in the auditor’s responsibilities section of an auditor’s report emphasizes the need for the auditor to exercise judgment as to the procedures, within the framework of the ISAs. We suggest that the illustrative report in the proposed standard should follow a similar approach, namely that the report should provide a brief summary of the nature of the engagement and explain that the procedures performed by the practitioner depend on the practitioner’s judgment, exercised within the context of ISAE 3420.

If, however, the requirement in paragraph 31(g) is retained as currently drafted, we note that:

- ▶ The second and third procedures set out in the illustrative report (i.e., “*evaluating* whether management has used...” and “*checking* whether management has appropriately...”) do not align with the requirement set out in paragraph 17, which requires that the practitioner “shall *determine* whether the responsible party has ...”. We suggest aligning the terminology, using “determine” within the illustrative report.
- ▶ The requirement in paragraph 18 uses different wording to express the procedures performed compared with the wording of bullets 4 and 5 of the procedures in the illustrative report. We suggest that these should be more closely aligned to the requirements in paragraph 18, using consistent wording to make it clearer that the practitioner’s report addresses these requirements. In addition, bullet 4 addresses procedures to evaluate the consistency of the compilation of the pro forma information

with the entity's financial reporting framework and its accounting policies. This concept is important, but is not addressed explicitly within paragraph 18(b). We suggest that the wording of the first sentence of paragraph A15, which refers to the necessity of consistency between the pro forma adjustments and the entity's applicable financial reporting framework and its accounting policies, be incorporated into the requirement in paragraph 18.

If the unadjusted financial information or financial information of the acquiree/divestee used in the pro forma adjustments is unaudited, the practitioner may wish to refer to this fact in his/her report. Therefore, guidance on the wording and placement within the practitioner's report would be helpful.

The proposed standard allows for the possible inclusion of an emphasis of matter paragraph in the practitioner's report. We believe that, in this type of engagement, the circumstances where such an emphasis of matter paragraph would be appropriate are difficult to distinguish from circumstances that require modification of the practitioner's report. We believe that the inclusion of examples would be very helpful to assist the practitioner in determining whether a modification to the opinion or an emphasis of matter paragraph is appropriate in the circumstances.

In addition, in some cases, the practitioner may have expressed a modified opinion on financial statements that are used to derive the unadjusted financial information, or included an emphasis of matter paragraph in the auditor's report on that financial information. We believe that it would be helpful for ISAE 3420 to provide guidance on how the practitioner would address such a modification or emphasis of matter paragraph in the practitioner's report on the process to compile the pro forma financial information.

2.4 Specific drafting suggestions

Paragraph 2 – It is not clear what “other underlying financial information” might be in relation to the pro forma information, and we suggest including an example to clarify this.

Footnote 30 – The Code of Ethics is defined in paragraph 7 of the proposed standard. We suggest using the defined term (i.e., IESBA Code) or referencing the definition within this footnote, as not doing so may imply that this is a different document from the one referenced in paragraph 7.

Paragraph 5, third bullet – We suggest modifying the wording of the bullet to read “...pro forma information with *appropriate* accompanying disclosures ...” for consistency with paragraph 22(c). Paragraph 5, last sentence – The term “properly compiled” appears to be included only in reference to paragraph A52 and the related opinion in the illustrative report. It is not generally used within the proposed standard. We therefore suggest that the proposed standard acknowledge that, in some jurisdictions, the practitioner is required to express an opinion that the pro forma information is “properly compiled”. This provides a context for the definition and the related material in paragraph A52.

Paragraph 10(g) – When the definition of “unadjusted financial information” is read in the context of the definition of “pro forma adjustments” (paragraph 10(b)), it appears to be a

“circular” definition, in that each term is defined only in the context of the other term. We believe that the definition of “unadjusted financial information” would benefit from being amended to recognize that it is the starting point for the process to compile the pro forma information. We suggest wording such as, “historical financial information extracted from an appropriate source and used by the responsible party as the starting point for compiling the pro forma information, i.e., the financial information prior to any pro forma adjustments being applied.”

Paragraphs 12(b) and 14(b) – As presently drafted, the requirements in these two paragraphs relating to the applicable criteria are similar but may imply different actions by a practitioner. If the intention is that the assessment of the applicable criteria is at a more detailed level in paragraph 14(b) than the determination of suitability using preliminary knowledge required in paragraph 12(b), we suggest that:

- ▶ The sub-section entitled *Assessing the Suitability of the Applicable Criteria* be moved to the *Planning and Performing the Engagement* section.
- ▶ Paragraph 13 be amended to also refer to paragraph 12(b), as follows: “As part of assessing whether the applicable criteria are suitable, as required by ISAE 3000 and paragraph 12(b), ...”.

Alternatively, the apparent duplication could be resolved by deleting the requirement from paragraph 12(b).

Paragraph 13 – We suggest that “encompass” be changed to “include” in the introductory sentence, to read “... the practitioner shall determine that they *include*, at a minimum, that:”

Paragraph 13(b)(ii) and related application material – The proposed standard uses the term “factually supportable” when describing the pro forma adjustments. We believe that it would be helpful to provide a definition of this term, given that it is used consistently throughout the proposed standard, but is not a term used elsewhere within the other standards developed by the IAASB. We suggest the following definition: Factually supportable – providing objective information or evidence to support or corroborate a pro forma adjustment.

Paragraph 24 – We suggest including an additional written representation that the responsible party acknowledges its responsibility for compiling the pro forma financial information. In addition, we suggest adding application material that the practitioner may consider obtaining written representations from the responsible party that:

- ▶ Confirm that the adjustments are factually supportable
- ▶ The accounting policies and financial reporting framework have been applied consistently
- ▶ Subsequent events have been adequately disclosed or the effects of such events have been appropriately reflected through adjustments to the underlying financial information

Paragraphs 26 and A47 – Although criteria that are publicly available are implicit to the process to compile the pro forma financial information, we would nonetheless expect that the fact that such criteria have been used would be disclosed in the pro forma financial information. This could be done, for example, by naming the law or regulation containing the criteria, so that users of the pro forma financial information could refer to them if necessary. We suggest adding wording to paragraph 26 or A47 to make this explicit.

Paragraph 31(h) – This paragraph introduces the concept of “proper application” of the process to compile the pro forma financial information. We suggest that paragraph 31(h) should instead reflect the wording used in paragraph A52, since the practitioner is not required to express an opinion on the “proper application” of the process but rather whether the process has “been applied in accordance with the applicable criteria” or has “been properly compiled on the basis stated.”

Paragraph A3 – We suggest changing “In most cases, ...” to “In many cases, ...”

Paragraph A4 – This paragraph uses the terms “unabridged financial statements” and “unabridged single financial statements”. We are uncertain as to whether these terms mean the same as a “complete set of financial statements” as used within the ISAs. If so, we suggest that this be stated; if not, we suggest that the terms be defined.

Paragraph A6 – The wording of paragraph A6 reads as a requirement, even though it does not contain the words “the practitioner shall”. We suggest that this paragraph be reworded as a requirement and moved to form part of paragraph 13.

Paragraph A10(b) – We suggest deleting “insofar as the responsible party is able to provide or procure it.” The requirement in paragraph 12(e)(iii) requires the responsible party to acknowledge responsibility for providing relevant information and access to appropriate individuals.

Paragraph A11 – We suggest amending this paragraph to clarify that, where law or regulation prescribes the terms of the engagement in sufficient detail, the written agreement would only need to state that such law or regulation applies and that the responsible party acknowledges and understands its responsibilities. We suggest wording such as “If law or regulation prescribes in sufficient detail the terms of the engagement, the practitioner need not record them in a written agreement. In this case, the written agreement would state that such law or regulation applies and that the responsible party acknowledges and understands its responsibilities as set out in paragraph 12(e).”

Paragraph A12 – “Pro forma financial information” is drafted in the singular in this sentence, but it is compared with “general purpose financial statements,” which seem to be plural. To remove this inconsistency, we suggest amending the wording to read “... by its nature does not comprise a complete set of general purpose financial statements...”

Paragraph A32 – There is a typographical error in the introductory sentence – delete either “that” or “the” in “... credibility of that the source ...”

Paragraph A33 – We believe that, where the entity’s financial information has never been audited or reviewed, it would always be appropriate to perform some additional procedures to determine whether that information is appropriate and fit for purpose. However, in our view, paragraph A33 leaves the impression that, in these circumstances, the practitioner may decide to perform no additional procedures. We therefore suggest that ISAE 3420 include a requirement for the practitioner to perform additional procedures in all circumstances when the entity’s financial information has never been audited or reviewed. The application material currently in paragraph A33 could then provide the examples of the additional procedures, but within the context that some procedures would always be appropriate.

Paragraph A44 – We suggest adding a new sentence to paragraph A44, as follows: “Relevant law or regulation may require the practitioner to express an opinion on matters other than whether the process to compile the pro forma financial information has, in all material respects, been applied by the responsible party in accordance with the applicable criteria. *In these circumstances, it may not be necessary for the practitioner to perform additional procedures.* The relevant law or regulation may, for example ...”

Paragraph A46 – We find this paragraph confusing. We suggest amending it to clarify that the practitioner may have additional responsibilities as a result of the requirements of law or regulation, and that, in this case, including a description of such additional responsibilities in the practitioner’s report is acceptable. If this is not the intent of this paragraph, we suggest the addition of an example to clarify the intent.

We would be pleased to discuss our comments with members of the International Auditing and Assurance Standards Board or its staff. If you wish to do so, please contact Dan Montgomery (+1 216 583 2949) or Denise Esdon (+ 1 416 943 2982).

Yours sincerely,

Ernst & Young Global Limited

Annex – Sentences longer than 45 words

Sentence in proposed ISAE 3420	Suggested alternative wording
Paragraph 1 (80+ words)	<p>This International Standard on Assurance Engagements (ISAE) deals with reasonable assurance engagements undertaken by a professional accountant in public practice (for purposes of this ISAE referred to as a “practitioner”) to report on the process to compile pro forma financial information included in a prospectus, where:</p> <ul style="list-style-type: none"> ▶ Such reporting is required by securities law or the regulation of the securities exchange (“relevant law or regulation”) in the jurisdiction in which the prospectus is to be issued; or ▶ This reporting is generally accepted practice in such jurisdiction.
Paragraph 7 (45+ words)	<p>Compliance with ISAE 3000 requires, among other things, that the practitioner:</p> <ul style="list-style-type: none"> ▶ Comply with the independence and other requirements of the <i>Code of Ethics for Professional Accountants</i> issued by the International Ethics Standards Board for Accountants (IESBA Code) and ▶ Implement quality control procedures that are applicable to the individual engagement.
Introduction to paragraph 20 (60+ words)	<p>The practitioner or another auditor may have expressed a modified audit opinion or review conclusion with respect to either the source of the unadjusted financial information or the source of the acquiree or divestee financial information, or may have issued a report containing an Emphasis of Matter paragraph with respect to such source. In this case, and if the relevant law or regulation does not prohibit the use of such a source, the practitioner shall evaluate:</p>
Paragraph 29 (50+words)	<p>The relevant law or regulation may permit publication of a prospectus that contains a modified opinion with regard to the process to compile the pro forma financial information. In such circumstances, if the practitioner determines that a modified opinion is appropriate, the practitioner shall apply the requirements in ISAE 3000 regarding modified opinions.</p>
First sentence of paragraph 30 (50+ words)	<p>In some circumstances, the practitioner may consider it necessary to draw users’ attention to a matter presented or disclosed in the pro forma financial information or the accompanying explanatory notes. This would be the case when, in the practitioner’s opinion, the matter is of such importance that it is fundamental to users’ understanding of the process to compile the pro forma financial information.</p>
Second sentence of paragraph 30	<p>In such circumstances, the practitioner shall include an Emphasis of Matter paragraph in the practitioner’s report provided that the practitioner has obtained sufficient appropriate evidence that the matter does not cause the</p>

Sentence in proposed ISAE 3420	Suggested alternative wording
(45+words)	pro forma financial information to not be properly compiled on the basis stated.
Point (f) of paragraph 31 (60+ words)	<p>(f) A statement that:</p> <ul style="list-style-type: none"> ▶ The engagement was performed in accordance with ISAE 3420, <i>Assurance Reports on the Process to Compile Pro Forma Financial Information Included in a Prospectus</i> ▶ ISAE 3420 requires that the practitioner comply with ethical requirements and plan and perform procedures to obtain reasonable assurance about whether the responsible party has applied the process to compile the pro forma financial information in accordance with the applicable criteria;
Second sentence in paragraph A2 (60+ words)	For example, where the entity is acquiring a number of businesses prior to an initial public offering, the responsible party may choose to present a pro forma net asset statement. The pro forma net asset statement illustrates the impact of the acquisitions on the entity's financial position and key ratios such as debt to equity had the businesses been combined with the entity at an earlier date.
Paragraph A4 (50+ words)	<p>Depending on how the responsible party chooses to illustrate the impact of the event or transaction, the unadjusted financial information may comprise either:</p> <ul style="list-style-type: none"> ▶ One or more unabridged single financial statements, such as a statement of financial position and a statement of comprehensive income, or ▶ Financial information that is appropriately condensed from unabridged financial statements, such as a statement of net assets.
Second sentence of paragraph A16 (60+ words)	<p>For example, as part of the event or transaction, the entity proposes to issue complex financial instruments for the first time. In this case, it may be necessary to consider:</p> <ul style="list-style-type: none"> ▶ Whether the responsible party has adopted appropriate accounting policies to account for such financial instruments under its applicable financial reporting framework, and ▶ Whether it has appropriately applied such policies in the process to compile the pro forma financial information.
Second sentence of paragraph A19 (50+ words)	Instead, it depends on the size and nature of the omission or inappropriate application of an element of the process as described in paragraph A18, whether or not intentional. This may be judged in the context of the event or transaction, the purpose for which the pro forma financial information is being

Sentence in proposed ISAE 3420	Suggested alternative wording
	compiled, and the related engagement circumstances.
Second sentence of paragraph A29 (50+ words)	In determining whether the source used by the responsible party is appropriate, the practitioner is obtaining evidence to determine whether this criterion has been satisfied by the responsible party in applying the process. The practitioner is not obtaining evidence for the purpose of reporting on the source or on the pro forma financial information itself.
First sentence of paragraph A37(45+ words)	Not all modified audit opinions, review conclusions or Emphasis of Matter paragraphs with respect to either the source of the unadjusted financial information or the source of the acquiree or divestee financial information necessarily affect the process to compile the pro forma financial information.
Second sentence of paragraph A37 (50+ words)	For example, the auditor may have expressed a qualified audit opinion on the entity's financial statements relating to the non-disclosure of remuneration for those charged with governance, as required by the applicable financial reporting framework. When the financial statements are the source for the unadjusted financial information, the qualified opinion may have no consequence on the process to compile pro forma net asset and income statements.
Second sentence of paragraph A40 (60+ words)	Nevertheless, when evaluating the presentation of the pro forma financial information, the practitioner considers whether the practitioner has become aware, through performing the procedures under this ISAE or otherwise, of any significant events subsequent to the date of the source of the unadjusted financial information. If so, the practitioner considers whether such events may require reference to, or disclosure in, the explanatory notes to the pro forma financial information to avoid the latter being misleading.
Paragraph A43 (60+ words)	In some cases, the circumstances involve types of transactions that require the responsible party to use accounting policies for the pro forma adjustments that the entity has not previously had to articulate because it had no relevant transactions. In such cases, the practitioner may request the responsible party to expand the written representation to include confirmation that such accounting policies constitute the entity's adopted policies for such types of transactions.
Paragraph A54 (50+ words)	The practitioner may conclude that performing the procedures set out in this ISAE would be sufficient to enable the practitioner to express the opinion in the prescribed wording. In this case, it may be appropriate to regard this wording as being generally equivalent to the wording of the opinion in the terms specified in paragraph A52.