

# Supplement P to Agenda Item 5

## RESPONSES RECEIVED ON THE DISCUSSION PAPER

### EXPLORING THE DEMAND FOR AGREED-UPON PROCEDURES ENGAGEMENTS AND OTHER SERVICES, AND THE IMPLICATIONS FOR THE IAASB'S INTERNATIONAL STANDARDS

#### COMMENTS TO QUESTION 15

**Note:** This supplement has been prepared for information only. A comprehensive summary of the significant comments received on the November 2016 Discussion Paper, *Exploring the Demand for Agreed-Upon Procedures Engagements and Other Services, and the Implications for the IAASB's International Standards* and related analyses of significant issues are presented at the [September 2017 IAASB meeting](#). All comment letters on the Discussion Paper can be accessed [here](#).

**Q15.** Do you agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements?

#	Respondent	Comments
<b>Those Charged with Governance</b>		
1.	IIA SA	Yes
<b>Regulators and Oversight Authorities</b>		
2.	EUROPEAN COMMISSION	Absolutely yes. Before addressing multi-scope engagements, and only if strictly needed, issues within the AUP should first be clarified and addressed.
3.	IRBA	We agree with the Working Group's proposal that the update of ISRS 4400 is necessary and is a priority that should be addressed before guidance on multi-scope engagements is developed. In the interim, the IAASB should address multi-scope engagements, as suggested in our response to question 14.
<b>National Auditing Standard Setters</b>		
4.	AASB-CNAC	We agree that it would be more efficient to address the issues relating to AUP engagements before multi-scope engagements. Once ISRS 4400 has been revised, the IAASB can revisit multi-scope engagements to determine what type of guidance, if any, is still needed.

		Nonetheless, if resources permit, the IAASB may consider developing non-authoritative guidance on selected multi-scope engagement issues (for example, those that are unlikely to be impacted by the ISRS 4400 revision project).
5.	AUASB	<p><i>Combined answer to question 14 and 15</i></p> <p>With the increase in demand for multi-scope engagements, the AUASB believes guidance is necessary in this area, particularly around reporting. To this end, the AUASB in June 2015 issued a guidance statement, GS 022 Grant Acquittals and Multi-Scope Engagements, to assist auditors in exercising professional judgement in applying the auditing standards to a selection of practical application issues that may arise in this area. The IAASB may find this guidance beneficial in the development of international guidance in this area.</p> <p>Owing to the age of the extant ISRS 4400, and the increase in demand for such engagements, the AUASB agrees that a revision to ISRS 4400 be prioritised over guidance on multi-scope engagements.</p>
6.	CNCC-CSOEC	<p>As mentioned in question 14, we consider that the IAASB should address issues within AUP engagements before addressing multi-scope engagements.</p> <p><i>Suggestions regarding the nature of guidance on multi-scope engagements you think would be helpful and any examples of multi-scope engagements of which you are aware will be welcome and will help to inform further deliberations.</i></p> <p>An example of multi-scope engagement is an engagement including some AUP and some work requiring audit-type procedures and an opinion.</p> <p>We recommend that the IAASB should address the following issues in the guidance:</p> <ul style="list-style-type: none"> <li>• How to combine AUP (non-assurance engagement) with a reasonable/ limited assurance engagement, especially if the different engagements are presented in a same report?</li> <li>• How to manage the case where the client has defined AUP and requires reasonable assurance conclusion about matters covered by AUP?</li> </ul>
7.	FAP	NO RESPONSE
8.	HKICPA	We support the Working Group's view to update ISRS 4400 first before developing guidance on multi-scope engagements. Hopefully, the updated ISRS 4400 would better address the objectives of regulators and would be more receptive to such reporting.
9.	IDW	We very much agree with the Working Group that AUP engagements should be addressed prior to addressing multi-scope engagements because the results of a project to revise ISRS 4400 would have an impact on the nature and content of any authoritative or non-authoritative guidance on such multi-scope engagements.
10.	JICPA	We agree with the Working Group's view.
11.	MAASB	The AASB agrees that issues within ISRS 4400 should be prioritised and addressed before multi-scope engagements are addressed.
12.	NBA	Yes, we agree with your view on this (see Q14). The various elements of multi-scope engagements comply with the corresponding IAASB Standards. A practice note to explain this might be useful.
13.	NZAuASB	The NZAuASB agrees that a revised standard addressing AUP engagements should be a priority over developing guidance on multi-scope engagements. In a multi-scope engagement, the practitioner complies with the corresponding IAASB pronouncements.

		<p>Accordingly, having up-to-date standards on each type of engagement that could be a part of a multi-scope engagement is the best starting point.</p> <p>Suggestions regarding the nature of guidance on multi-scope engagements you think would be helpful and any examples of multi-scope engagements which you are aware will be welcome and will help to inform further deliberations.</p> <p>To assist practitioners to prepare a report on a multi-scope engagement, guidance in the following areas would be helpful:</p> <ul style="list-style-type: none"> <li>•Incorporating the required elements/items within one document;</li> <li>•Distinguishing the work performed and the related assurance; and</li> <li>•Removing duplication.</li> </ul> <p>Similar guidance may also be helpful for the preparation of the engagement letter.</p> <p>The guidance should also clarify that in performing each piece of the multi-scope engagement, the practitioner is required to follow the relevant international standards.</p> <p>The NZAuASB is aware of the following examples of multi-scope engagements in New Zealand:</p> <ul style="list-style-type: none"> <li>•Standard Conditions for derivatives issuer licences requires a qualified auditor to provide the governing body and the Financial Markets Authority with: <ul style="list-style-type: none"> <li>a.an assurance report on the design and operating effectiveness of financial resources controls throughout the most recently completed accounting period; and</li> <li>b.a report of factual findings in respect of the Net Tangible Asset calculation as at the end of the most recently completed accounting period on the basis of the audited financial statements.</li> </ul> </li> <li>•The Reserve Bank Registered Bank Orders require an audit of the financial statements and certain supplementary information and a review over capital adequacy and credit and market risk information.</li> <li>•Under the Gambling Act 2003 Class 4 Gaming entities that apply for a gambling licence must provide the Department of Internal Affairs with audited financial statements, assurance over forecast financial statements, and an agreed-upon procedures report to verify the financial information provided in the Gaming Machine Account Summary form.</li> <li>•Under the Financial Markets Conduct Regulations 2014, trustee reporting engagements may require a combination of assurance, agreed-upon procedures and other requested reporting in accordance with the Trust Deed.</li> </ul>
<b>Accounting Firms</b>		
14.	BDO	<p>We agree that it would be more efficient for the Working Group to complete the revisions to ISRS 4400 prior to developing guidance on multi-scope engagements.</p> <p>Suggestions regarding the nature of guidance on multi-scope engagements you think would be helpful and any examples of multi-scope engagements of which you are aware will be welcome and will help to inform further deliberations.</p> <p>We suggest guidance on multi-scope engagements include the following:</p> <ul style="list-style-type: none"> <li>• Structure of the report containing various elements of reasonable assurance engagements, limited assurance engagements, and non-assurance engagements. We suggest including an introduction which lists the engagements included with the package of</li> </ul>

		<p>reports. Each engagement would then have its own section within the package of deliverables, with its own report / communication.</p> <ul style="list-style-type: none"> <li>Independence considerations where, prior to engagement acceptance of a multi-scope engagement, the practitioner is required to assess if independence is required. If at least one of the engagements in the multi-scope engagement requires independence, then the practitioner must be independent or they cannot accept the multi-scope engagement.</li> <li>Illustrative examples of reports issued in multi-scope engagements.</li> </ul> <p>Other examples of multi-scope engagements include:</p> <ul style="list-style-type: none"> <li>reporting on grants and framework programs in addition to an audit of financial statements;</li> <li>performing AUP on certain financial or non-financial data in addition to an audit of financial statements; and</li> <li>performing an ISA 805 engagement on an element of the financial statements in addition to an audit of financial statements.</li> </ul>
15.	CHI	Issues relating to AUP engagements should be addressed first.
16.	DTTL	Yes, DTTL agrees the IAASB should first address issues related to AUP engagements, before embarking on a project focusing on multi-scope engagements.
17.	EYG	Yes, we agree. It is important that the IAASB standards that form the foundation of the potential elements of multi-scope engagements, including ISRS 4400, are fit for their intended purposes prior to the IAASB addressing engagements that apply these standards in combination.
18.	GTIL	<p><i>Combined answer to question 14 and 15</i></p> <p>We agree with the proposals in the Discussion Paper that focus should continue to be on the current projects on the IAASB Work Plan for 2017-2018, which incorporates revisions to ISRS 4400 as a project commencing in 2017.</p> <p>Further, in respect of multi-scope engagements, we are of the view that further outreach is needed to understand what the specific issues are with respect to performing such engagements. If interim guidance is considered appropriate, national auditing standard setters may be better placed to issue any non-authoritative guidance required. This could include developing a "road map" that would help practitioners determine which standards or other local reporting requirements an engagement will be governed by.</p>
19.	KINGSTON SMITH LLP	Yes, we agree that AUP engagements should be the IAASB's priority.
20.	KPMG	<p><i>Combined answer to question 8, 14 and 15</i></p> <p>We understand that multi-scope engagements are becoming more common with increased regulatory oversight, and the resulting development of regulatory reporting frameworks.</p> <p>We are aware of three types of engagement that could be considered to be "multi-scope" or hybrid:</p> <ol style="list-style-type: none"> <li>Engagements where the practitioner is requested to provide limited or reasonable assurance on certain subject matter information, as well as reporting factual findings on an entirely distinct, but related, subject matter information. For example, when a practitioner reports on an audit of financial statements, as well as, factual findings on procedures required by a regulator;</li> </ol>

		<p>2. Engagements where the practitioner is requested to provide limited or reasonable assurance on certain subject matter information, with the scope of their work including certain procedures specified by the preparer, and/or user, and their assurance report is required to include the findings from these procedures. For example, when a practitioner provides an assurance conclusion on financial information prepared pursuant to the terms and conditions of a grant, as well as factual findings on specific internal controls as specified in the grant conditions; and</p> <p>3. Engagements where the preparer and/or third-party user's intention is to request an AUP, but the actual scope of work specified includes procedures that require application of judgement and/or forming of subjective views. The practitioner agrees to provide a long-form narrative report including results of testing, professional views, and recommendations, but no opinion.</p> <p>We believe that the above scenarios describe areas of emerging practice. While we do not believe that these scenarios should be within the scope of a revision to extant ISRS 4400, practitioners may benefit from more guidance in this area at some point in the future as practice in this area evolves. Accordingly, we recommend that IAASB monitor the development of such engagements and consider the need to develop additional guidance in this area at some point in the future.</p>
21.	PKFI	<p><b>Of importance, while we appreciate the observations around the need for the IAASB to consider multi-scope engagement guidance, but urge the IAASB not to delay revisions to the existing ISRS 4400 in order to accommodate multi-scope arrangements. The Working Group's outreach confirmed that the demand for AUP engagements continues to grow and clarity provided by the revision is long overdue.</b></p> <p>Yes, we agree with the WG's view to address issues within AUP engagements before it addresses multi-scope engagements. The following are issues that the WG could consider addressing in the guidance for multi-scope engagements:</p> <ul style="list-style-type: none"> <li>• Re-enforcing the use of appropriate engagement letters to achieve clarity on scope;</li> <li>• Re-enforcing the use of appropriate management representation letters for each scope;</li> <li>• Address the use of professional judgement when performing multi-scope engagements;</li> <li>• Guidance on the use of separate and combined scope reporting.</li> </ul>
22.	PwC	<p>Since we do not think multi-scope engagements are, in principle, challenging, we think it ought to be possible to include some limited guidance in the revision to the standard. If additional guidance is needed for specific types of multi-scope engagement, then we agree that this might be addressed later by the Board in, for example, a Practice Note.</p>
23.	RSM	<p>Multi scope engagements are covered by other standards and therefore these standards should be applied to each element of the engagement. There are some areas where there could be differences between the standards such that determining whether the practitioner can carry out all of the elements of a multi-scope engagement could prove challenging.</p> <p>Non-authoritative guidance might therefore be useful as a reminder that the practitioner should consider carefully the professional requirements of all elements of the engagement as part of the acceptance process.</p> <p>We agree that the IAASB should consider the issue of AUP engagements before addressing multi-scope engagements.</p>
<b>Public Sector Organizations</b>		

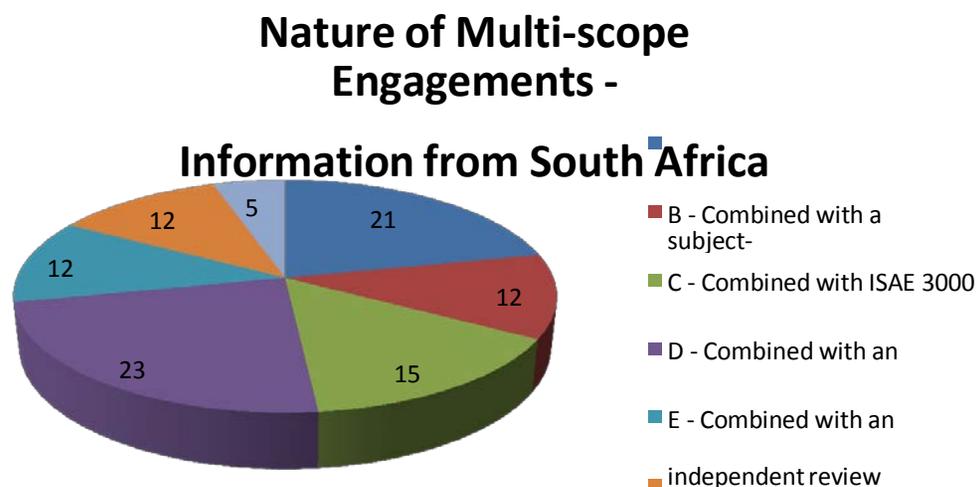
24.	AUDIT NEW ZEALAND	Yes, our view is that it would be best to address the issues with AUP engagements first.
25.	CIPFA	CIPFA agrees with the Working Group's view.
26.	PAS	Yes, as stated above, the different aspects of a multi-scope engagement should already be conducted in compliance with their respective IAASB standard. Therefore, focus should be to address the AUP engagement, and then asses if the Working Group needs to address multi-scope engagements.
<b>Member Bodies and Other Professional Organizations</b>		
27.	ACCA	ACCA agrees with the Working Group's view.
28.	AE	<p><b>Moreover, non-authoritative guidance may be useful to address multi-scope engagements. However, this should be done upon completion of the revised ISRS 4400.</b></p> <p>We agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements.</p> <p>As mentioned above, an example of multi-scope engagement is an engagement including some AUP and some work requiring audit-type procedures and findings as opposed to "factual findings". The IAASB could also help mitigate the gap between what regulators/government bodies think is AUP as opposed to assurance engagements where a more extensive exercise of professional judgement is required.</p>
29.	AICPA	<p><i>Combined answer to question 14 and 15</i></p> <p>AT-C section 215 contains the following guidance in the scope section that is relevant to multi-scope engagements:</p> <p>When a practitioner performs services pursuant to an engagement to apply agreed-upon procedures to subject matter as part of or in addition to another form of service, this section applies only to those services described herein; other professional standards would apply to the other services. Other services may include an audit, review, or compilation of a financial statement, another attestation service performed pursuant to the attestation standards, or a nonattestation service. A practitioner's report on applying agreed-upon procedures to subject matter may be combined with a report on such other services, provided the types of services can be clearly distinguished, and the applicable standards for each service are followed.</p> <p>We believe that adding the above guidance to revised ISRS 4400 would suffice. To the extent the IAASB does not agree, we agree with the Working Group that issues within AUP engagements should be addressed before multi-scope engagements are addressed.</p>
30.	ASSIREVI	Yes, we agree (see also A14. above). We believe the IAASB should focus its efforts on providing clarification and guidance on existing concepts and issues with AUPs engagements rather than focusing on developing new standards or projects which might have unintended effects. In our view, including additional requirements and other considerations in the Standard might increase the risk that there is little practical difference between AUP engagements and assurance engagements.

31.	CAANZ	<p>Yes, we agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements. Refer to our response to Question 14 for suggestions regarding our suggestions on the nature of guidance on multi-scope engagements. We consider the following helpful examples of multi-scope engagements:</p> <ul style="list-style-type: none"> <li>• Issued by the Australian Auditing and Assurance Standards Board: <ul style="list-style-type: none"> <li>o Guidance Statement GS 022 Grant acquittals and multi-scope engagements;</li> <li>o Guidance Statement GS 017 Audit implications for prudential reporting requirements of a life company;</li> <li>o Guidance Statement GS 021 Engagements under the national greenhouse and energy reporting scheme, carbon pricing mechanism and related schemes;</li> </ul> </li> <li>• Prudential Standard SPS 310 Audit and related matters, issued by the Australian Prudential Regulation Authority, which requires multiple auditor's reports on financial statements, other information and compliance.</li> </ul>
32.	CAI	<p>Yes, agree that ISRS 4400 revisions are needed in priority to developing guidance for multi-scope engagements.</p>
33.	CPAA	<p>We agree that AUP engagements should be addressed first through revising ISRS 4400, before multi-scope engagements are addressed.</p> <p>We consider that there is a need for both amendments to the Framework to address how engagements can be combined, as noted above, and guidance to assist practitioners in implementing multi-scope engagements. However, such guidance may be more appropriately developed in national jurisdictions rather than at the international level, as the nature of the engagements is largely driven by national, state or local regulatory requirements or industry practice. In Australia, Guidance Statement GS 022 Grant Acquittals and Multi-Scope Engagements, issued in June 2015, provides guidance on challenges arising from regulatory and industry requirements for multi-scope engagements and how these challenges may be addressed. Many of the examples of multi-scope engagements are specific to the Australian regulatory environment.</p> <p>Multi-scope engagements are very common in Australia and are required in a number of different industries by regulators. Examples of the multi-scope engagements can be found in the Guidance Statements issued by the AUASB, with example reports included in the appendices and/or published on the regulator's website. These multi-scope engagements include:</p> <ul style="list-style-type: none"> <li>• Registered Superannuation entities: GS 002 Audit Implications of Prudential Reporting Requirements for Registered Superannuation Entities &amp; registrable superannuation entity auditor's report approved forms (PDF) issued by Australian Prudential Regulation Authority.</li> <li>• Financial Services Licences: GS 003 Assurance Relating to Australian Financial Services Licences issued under the Corporations Act 2001 &amp; Auditor's Report for AFS Licensee (FS71) issued by Australian Securities and Investment Commission (ASIC).</li> <li>• Self-Managed Superannuation Funds: GS 009 Auditing Self-Managed Superannuation Funds &amp; self-managed superannuation fund independent auditor's report approved form issued by the Australian Taxation Office</li> <li>• GS 012 Prudential Reporting Requirements for Auditors of Authorised Deposit-taking Institutions</li> <li>• GS 017 Audit Implications for Prudential Reporting Requirements of a Life Company</li> </ul>

		<ul style="list-style-type: none"> <li>GS 021 Engagements under the National Greenhouse and Energy Reporting Scheme, Carbon Pricing Mechanism and Related Schemes &amp; Audit Determination Handbook and audit templates issued by the Clean Energy Regulator.</li> </ul>
34.	EFAA	<p><i>Combined answer to question 14 and 15</i></p> <p>We agree.</p> <p>Issues within AUP engagements should be addressed with high priority. Nevertheless multi-scope engagements are an important issue to cover. Due to the complexity of arising questions (e.g. combination of different kinds of confirmation / assurance, interrelation of findings, form of the report) it seems better to address these engagements in non-binding guidance.</p>
35.	FACPCE	Yes, we agree
36.	FAR	<p>Yes. The AUP report is an important report for the SMP:s and the ISRS 4400 needs to be updated and more informative to practitioners. How to form a report with the right vocabulary needs to be expressed in the revised ISRS 4400.</p> <p>Many auditors don't have a lot of practice in AUP reports, which leads to problems when forming procedures for the objective needed to verify. When the revised ISRS 4400 is published it would be helpful with three short films on YouTube together with slides "How to form procedures when doing AUP", "How to perform an AUP" and "How to form an AUP report".</p>
37.	FSR	<p>We agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements.</p> <p><i>Suggestions regarding the nature of guidance on multi-scope engagements you think would be helpful and any examples of multi-scope engagements of which you are aware will be welcome and will help to inform further deliberations.</i></p> <p>Usually we see multi-scope engagements as part of assurance engagements, were for example regulation requires the practitioner to perform specific procedures etc. and report specifically on these as part of the assurance report.</p> <p>We believe that more guidance should be developed in regards to how the practitioner should report based on different types of additional reporting requirements there could be in connection with an assurance engagement.</p>
38.	IBR-IRE	We fully agree with the Working Group's view.
39.	ICAEW	<p><i>Combined answer to question 14 and 15</i></p> <p>34. While multi-scope engagements are increasing in frequency, we do not consider the performance of these to be especially challenging as each element of a multi-scope engagement should be subject to its own individual standards (which could be, for example, ISAE 3000 or ISRS 4400). It is more a matter of recognising that the engagement has a number of distinct parts and then drawing on the relevant standard to address each part of the engagement and reporting on each part in line with these standards.</p> <p>35. The IAASB could, therefore, usefully issue non-authoritative guidance which just clarifies this.</p>
40.	ICAG	Yes. Single scope engagements issues need to be flushed out first before considering more complex ones.

		We do not have any suggestions on the nature of guidance on multi-scope engagements nor any examples of multi-scope engagements at the moment.
41.	ICAS	We agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements. We have no suggestions of guidance on, or examples of, multi-scope engagements to help inform further deliberations.
42.	ICASL	It should address the issues within AUP engagements prior to other developments such as framework for multi-scope engagements.
43.	ICAZ	We agree with the Working Group's view, that an update of ISRS 4400 is necessary as a priority and needs to be addressed before potentially developing guidance on multi-scope engagements. If there is still need to address multi-scope engagements after the revised ISRS 4400 the Working Group can then develop the guidance.
44.	ICPAU	<ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Suggestions regarding the nature of guidance on multi-scope engagements you think would be helpful and any examples of multi-scope engagements of which you are aware will be welcome and will help to inform further deliberations.</p> <ul style="list-style-type: none"> <li>• NA</li> </ul>
45.	ISCA	NO RESPONSE
46.	KICPA	<p>We support the Working Group's view.</p> <p>Just as the view, addressing AUP issues within ISRS 4400 and then addressing multi-scope engagement accordingly would be the most efficient way. For example, including the use of an expert in the AUP engagement standards but not including it in the multi-scope engagement standards could trigger more confusion to professional accountants using both of the standards.</p> <p>To achieve consistency between AUP engagements and multi-scope engagements, it would be necessary to clearly address issues within AUP engagements and then move to multi-scope engagements.</p> <p>As a minority opinion, however, some expressed that addressing AUP engagements and multi-scope engagements all together would be more efficient, citing that the temporary measure of providing non-authoritative guidance could rather create confusion in relation with multi-scope engagements and this revision issues are associated with assurance engagements, including professional judgment and independence.</p>
47.	MICPA	Whilst the Institute take cognisance of the rationale for the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements, MICPA opines that the Working Group should try to addresses multi-scope engagements as soon as possible due to the reason as explained in its comments to Question 14 above.
48.	NASBA	We believe that addressing the issues within AUP engagements should take priority over guidance on multi-scope engagements. Such guidance, when provided, could be limited to reinforcing the point that each component needs to comply with the standards applicable to it.
49.	SAICA	26. 95% of survey respondents agreed that the Working Group should address AUP engagements before it addresses multi-

scope engagements.  
27. SAICA also requested respondents that have received requests to perform multi-scope engagements to indicate the nature of such engagements. 37% of survey respondents confirmed receiving such requests, and indicated the nature of these multi-scope engagements as follows:



28. The results of the SAICA survey as well as feedback received during our consultations indicated that multi-scope engagements are not common and are mainly performed by the larger audit firms. From a local perspective, for the more common multi-scope engagements, the IRBA has issued guidance (also refer to question 14 above).

29. SAICA believes that the focus should currently be on revising ISRS 4400. Since a multi-scope engagement draws on the principles contained in different International Standards, it is advisable to establish sound principles relating to each stand-alone engagement before attempting to provide guidance on combining these engagements. Once the project on the revision of ISRS 4400 is completed, the IAASB could consider the demand for guidance in relation to multi-scope engagements and the impact that this may have on the revised ISRS 4400 (and other International Standards).

<sup>42</sup> Discussion Paper, paragraph 55

50.	SAIPA	SAIPA's view is that multi-scope engagements guidance notes should be dealt with either as interpretative notes or be left to the other committee structures to deal with. There must be a clear distinction on the work of the Board and the relevant committees. We see the guidance being a priority but not on the IAASB's work schedule.
51.	SMPC	We agree with the Working Group's view that it should address issues within AUP engagements before it addresses multi-scope engagements.

52.	WPK	<p>Yes we do agree. Issues within AUP engagements should be addressed with priority.</p> <p>Nevertheless multi-scope engagements are an important issue to cover. Due to the complexity of arising questions (e.g. combination of different kinds of confirmation / assurance, interrelation of findings, form of the report) it seems better to address these engagements in non-binding guidance.</p>
<b>Individuals and Others</b>		
53.	14000REGISTRY	We concur.
54.	ANA	<p><b>10. Conduct the Working Group outreach activities in South Asian Region (specially Pakistan) . We are sure that our honourable Institute will welcome any such interaction. At the local level we wish some kind of research is conducted to assess the level of understanding of the practitioners of this subject . Q15</b></p> <p><b>11. Use simple English for achieving greater level of readability and strengthen public confidence in your publications. Address stakeholders directly. Train your team members to use plain English . Many passages in the text may be expressed in much simpler words. Q15</b></p> <p><b>12. Define the terms used frequently such as ‘professional judgment’, ‘objectively verifiable factual finding’ etc. Make a Basis of Conclusion a part of the revised ISRS 4400. Q15</b></p> <p>We agree with the sequence that the ISRS 4400 should be revised before taking up the multi-scope engagements.</p> <p>Conduct the Working Group outreach activities in South Asian Region (specially Pakistan) . We are sure that our honourable Institute will welcome any such interaction. At the local level we wish some kind of research is conducted to assess the level of understanding of the practitioners of this subject.</p> <p>Use simple English for achieving greater level of readability and strengthen public confidence in your publications. Address stakeholders directly. Train your team members to use plain English. Many passages in the text may be expressed in much simpler words.</p> <p>Define the terms used frequently such as ‘professional judgment’, ‘objectively verifiable factual finding’ etc. Make a Basis of Conclusion a part of the revised ISRS 4400.</p>