

Proposed ISRS 4400 (Revised)¹—Issues and Recommendations

Objectives of Agenda Item

The objectives of this agenda item are to:

- Present the Agreed-upon Procedures (AUP) Task Force's (Task Force) proposed revisions to extant ISRS 4400²; and
- Solicit directions to the Task Force on key issues.

1. Introduction and Overview of Agenda Items

1. In September 2017, the IAASB approved a [project proposal](#) to revise extant ISRS 4400, *Engagements to Perform Agreed-Upon Procedures Regarding Financial Information*. The revision of extant ISRS 4400 includes redrafting the standard in accordance with the clarity convention.
2. Since the IAASB's approval of the project proposal to revise extant ISRS 4400, the Task Force has been analyzing key issues and developing a working draft of proposed ISRS 4400 (Revised), *Agreed-Upon Procedures Engagements* [Agenda Item 5-A]. Key issues in revising ISRS 4400 identified by the Task Force include:
 - Definition and description of the term "Findings" (See Section 2);
 - Parties involved in an agreed-upon procedures engagement and the practitioner's responsibilities relating to each party (See Section 3);
 - Liaison with the IESBA³ on a contemplated requirement on disclosure of non-independence (See Section 4); and
 - Proposed dispositions of additional issues identified in the Project Proposal (See Section 5).
3. In addition to the key issues identified above, the Task Force is currently monitoring developments that may impact the revision of ISRS 4400. These developments are listed in Section 6.
4. The Task Force has developed Agenda Item 5-A to support the discussion at this meeting. In addition, for reference, the Task Force has prepared a comparison between the working draft of proposed ISRS 4400 (Revised) and extant ISRS 4400 [Agenda Item 5-B].
5. An extract from the draft minutes of the September 2017 IAASB meeting related to Agreed-Upon Procedures Engagements is included in the Appendix.

¹ Proposed ISRS 4400 (Revised), *Agreed-Upon Procedures Engagements*

² Extant ISRS 4400, *Engagements to Perform Agreed-Upon Procedures Regarding Financial Information*

³ International Ethics Standards Board for Accountants

2. Definition and Description of the Term “Findings”

6. In November 2016, the AUP Working Group issued a Discussion Paper, [*Exploring the Demand for Agreed-Upon Procedures Engagements and Other Services, and the Implications for the IAASB’s International Standards*](#), which provided a discussion of various issues identified by the Working Group. The Discussion Paper set out the Working Group’s view that an AUP engagement should result in objectively verifiable **factual findings** and not subjective opinions or conclusions. A significant majority of respondents agreed with the Working Group’s position or confirmed that this position is consistent with their understanding. Extant ISRS 4400 also refers to “factual findings”.
7. The Task Force agrees that reporting the results of performing the agreed-upon procedures should be factual. The Task Force, however, discussed whether the term “factual findings” may imply that there might be findings that are “not factual”. Further, the term “factual findings” is translated as “findings” in some jurisdictions, making no distinction between the term “findings” and “factual findings”.⁴
8. In developing Agenda Item 5A, the Task Force considered what term would best communicate that the results from performing the agreed-upon procedures must be factual. The Task Force proposes to:
 - Use the term “findings” instead of “factual findings”;
 - Include a definition that “findings are the factual results of procedures performed and are capable of being objectively verified. The findings in an agreed-upon procedures engagement report are described objectively. References to findings in this ISRS exclude opinions or assurance conclusions”; and
 - Require findings “to be described objectively, and in terms that are clear, not misleading, and not subject to varying interpretations.”

The above approach would also address potential translation issues. By referring to “findings” in the standard and defining “findings” as “...factual results...” would clarify the nature of “findings” regardless of whether the translated term used in the national standard makes a distinction between “findings” and “factual findings”.

[See para. 9(f), para. 17(d) and para. 17(e) of Agenda Item 5A.]

Matters for IAASB Consideration

1. The IAASB is asked for its views on the use of the term “findings” instead of “factual findings” in the standard.

⁴ For example, the national AUP standard in France translates the term “factual findings” as simply “findings” (*constats*).

3. Parties Involved with an AUP Engagement and The Practitioner’s Responsibilities Relating to Each Party

9. Extant ISRS 4400 requires the practitioner’s report to include “a statement that the report is restricted to those **parties that have agreed to the procedures to be performed** since others, unaware of the reasons for the procedures, may misinterpret the results.”⁵ The Discussion Paper identified a need to:

- Clarify who the “parties that have agreed to the procedures to be performed” are; and
- Allow for the AUP engagement report to be provided to a party (such as a regulator or funder) who is often not a signatory to the engagement letter.

A significant majority of respondents to the Discussion Paper agreed.

10. “Parties that have agreed to the procedures to be performed” could be interpreted as referring to:

- The engaging party only; or
- The engaging party and the intended users.

Further, the engaging party may or may not be the responsible party.

11. To respond to the need identified in the Discussion Paper and to reflect the stakeholders’ comments on the Discussion Paper, the Task Force included definitions for the various parties involved in an AUP engagement, and developed requirements and application material to clearly set out the practitioner’s responsibilities relating to each of this party.

Party	Key practitioner’s responsibilities relating to this party	Para. Ref. in Agenda Item 5-A
Engaging party	Definition	
	The party(ies) that engaged the practitioner to perform the AUP engagement.	9(c)
	Engagement Acceptance	
	Before accepting the engagement, determine that the engaging party: <ul style="list-style-type: none"> • Has a clear understanding of the procedures to be performed; and • Acknowledges the appropriateness of the procedures to be performed. 	17(a), 17(b)
	Agree the terms of the engagement, including acknowledgement by the engaging party for the appropriateness of the procedures	17(b), 18(c)

⁵ ISRS 4400, paragraph 6

	If modifications to the procedures agreed upon are needed, agree the amended terms of engagement with the engaging party.	19
	Performing the engagement	
	<p>If the practitioner becomes aware of:</p> <ul style="list-style-type: none"> • Matters that may indicate fraud or non-compliance with laws or regulations; or • Other matters that cast doubt on the information relevant to the agreed-upon procedures engagement, or indicate in any other way that the information may be misleading, <p>The practitioner may discuss the matter with the engaging party if considered appropriate.</p>	A10
	Reporting	
	Address the agreed-upon procedures engagement report to the engaging party.	A28
	Consider whether to indicate that the agreed-upon procedures engagement report is intended solely for the engaging party and the intended users. Depending on the law or regulation of the particular jurisdiction, this may be achieved by restricting the distribution or use of the agreed-upon procedures engagement report.	A29
Intended users	Definition	
	The individual(s), organization(s), or group(s) that will use the AUP engagement report.	9(d)
	Engagement acceptance	
	<p>Before accepting the engagement, determine that the intended user(s) have a clear understanding of the procedures to be performed. This may be achieved by, for example:</p> <ul style="list-style-type: none"> • Distributing a copy of the anticipated terms of engagement, including a draft of the anticipated agreed-upon procedures engagement report, to the intended user(s). • Comparing the procedures to be performed with written requirements set out in law or regulation, or in a contractual agreement (sometimes referred to as the “Terms of Reference”) where appropriate. • Discussing the procedures to be performed with appropriate representatives of the intended user(s). 	17(a), A12

	<ul style="list-style-type: none"> Reviewing correspondences between the engaging party and the intended user(s) if the engaging party is not the intended user. 	
	Identify the intended user(s) when agreeing the terms of the engagement with the engaging party. If law or regulation specify that the agreed-upon procedures engagement report be provided to a wide range of entities or people, the practitioner may identify identifiable group(s) of intended user(s) instead of all individual intended users in the terms of engagement.	18(d), A19
	Performing the engagement	
	<p>If the practitioner becomes aware of:</p> <ul style="list-style-type: none"> Matters that may indicate fraud or non-compliance with laws or regulations; or Other matters that cast doubt on the information relevant to the agreed-upon procedures engagement, or indicate in any other way that the information may be misleading, <p>The practitioner may discuss the matter with the intended user(s) if considered appropriate.</p>	A10
	Reporting	
	Consider whether to indicate that the agreed-upon procedures engagement report is intended solely for the engaging party and the intended users. Depending on the law or regulation of the particular jurisdiction, this may be achieved by restricting the distribution or use of the agreed-upon procedures engagement report.	A29
Responsible party	Definition	
	The party(ies) responsible for the subject matter to which the agreed-upon procedures are applied.	9(h)
	Engagement acceptance	
	If the responsible party is not the engaging party, practitioner may, in some cases, discuss the procedures to be performed.	A10
	Performing the engagement	
	<p>If the practitioner becomes aware of:</p> <ul style="list-style-type: none"> Matters that may indicate fraud or non-compliance with laws or regulations; or Other matters that cast doubt on the information relevant to the agreed-upon procedures engagement, or indicate in any other way that the information may be misleading, 	A10

	The practitioner may discuss the matter with the responsible party if considered appropriate.	
	Reporting	
	If the responsible party is not the engaging party, consider including a statement in the agreed-upon procedures engagement report to identify the responsible party.	A31

Matters for IAASB Consideration

2. The IAASB is asked for its views on the proposed approach to:
 - a) Clarify who the “parties that have agreed to the procedures to be performed” are; and
 - b) Allow for the AUP engagement report to be provided to a party (such as a regulator or funder) who is often not a signatory to the engagement letter?

4. References to IESBA Code, Disclosure of Non-Independence, and Liaison with the IESBA

References to IESBA Code

12. The International Ethics Standards Board for Accountants (IESBA) has recently issued the restructured *Code of Professional Ethics for Professional Accountants* (IESBA Code). References to the IESBA Code in Agenda Item 5A reflect the restructured IESBA Code. The Task Force discussed the references to the restructured IESBA Code with the IESBA member responsible for coordination with the IAASB, Ms. Sylvie Soulier, at its January 2018 meeting. While Agenda Item 5A reflects comments raised by Ms. Soulier at the January 2018 meeting, the wording has not been reviewed by Ms. Soulier or the IESBA staff. The Task Force will continue to liaise with Ms. Soulier and the IESBA staff on references to the restructured IESBA Code as the project progresses.

[See para. 14 and para. A5 of Agenda Item 5A.]

Disclosure of Non-Independence

13. The IESBA Code requires the practitioner to be objective, but not independent, when performing non-assurance engagements such as AUP engagements. Consistent with the IESBA Code, extant ISRS 4400 indicates that “independence is not a requirement for AUP engagements.” However, extant ISRS 4400 states that, “where the [practitioner] is not independent, a statement to that effect would be made in the report of factual findings.”⁶ A majority of respondents to the Discussion Paper agreed with the existing approach.
14. In developing the disclosure requirement when the practitioner is not independent, the Task Force believe it is necessary for the revised standard to provide guidance to the practitioner on what is independence in an AUP engagement. Such guidance might include the development of criteria. A possible criterion might be derived from Part 4B of the IESBA Code (formerly Section 291,

⁶ ISRS 4400, paragraph 7

Independence – Other Assurance Engagements in the superseded IESBA Code). However, Part 4B of the IESBA Code does not currently apply to non-assurance engagements. The Task Force will continue liaison with Ms. Soulier and the IESBA staff on this matter and other matters relating to ethical requirements as the project progresses.

[See para. 15 and para. A6-A7 of Agenda Item 5-A.]

Matters for IAASB Consideration

3. The IAASB is asked for its views on the approach being taken to clarify the disclosure requirement on non-independence.

5. Proposed Dispositions of Significant Issues Identified in the Project Proposal

15. The IAASB approved the project proposal to revise ISRS 4400 in September 2017. The table below presents the significant issues identified in the project proposal and how the Task Force proposes to deal with those issues.

Issue Identified in the Project Proposal	Proposed Dispositions
5.1 Professional Judgment	
<p>Revisions to the requirements and development of application material on the role of professional judgment in an AUP engagement in areas such as engagement acceptance, modifying the terms of the engagement, planning the engagement, clarifying the practitioner’s responsibilities when becoming aware of fraud.</p>	<p>A requirement and application material have been developed to describe the role of professional judgment in an AUP engagement – (para. 16, A9 and A11 of Agenda Item 5A). In addition, Agenda Item 5A includes examples of areas where professional judgment is exercised, such as:</p> <ul style="list-style-type: none"> • Determining whether any of the procedures that the practitioner is being asked to agree to are clearly inappropriate for the purpose of the agreed-upon procedures engagement in para. A10. • Determining appropriate actions if the practitioner becomes aware of matters that may indicate fraud or non-compliance with laws or regulations, or other matters that cast doubt on the information relevant to the agreed-upon procedures engagement, or indicate in any other way that the information may be misleading in para. A10. • Determining that the intended users have a clear understanding of the procedures to be performed when the intended users are not a signatory to the terms of engagement in para. A12. • Discussing the nature, timing and extent of the procedures to be performed with the engaging party, and in some cases, the

	<p>intended users or the responsible party (if these parties are not the engaging party) or the practitioner’s expert, including circumstances in which the regulators set out the nature, but not the timing or extent, of the procedures to be performed in para. A10 and A13.</p> <ul style="list-style-type: none"> • Determining that the findings are described objectively, and that terms used in describing agreed-upon procedures or findings are clear, not misleading and not subject to varying interpretations in para. 17(c)-(e), A10 and A14-A17. • Modifying procedures that have been previously agreed-upon in para. 19 and A21. • Considering the resources necessary to carry out the procedures as agreed in the terms of the engagement in para. A24. This consideration highlights the professional judgment exercised in planning the engagement. • Considering whether to include in the agreed-upon procedures engagement report a statement to restrict the distribution or use of the report, to clarify that the report does not extend to other information, or to identify the responsible party (if the responsible party is not the engaging party) in para. A29-A31.
<p>5.2 Professional Skepticism</p>	
<p>Monitoring the developments of, and consulting with, the Professional Skepticism Working Group on any need to add references to skepticism in the revised standard.</p>	<p>Currently, professional skepticism is only referred to in standards dealing with audit and assurance engagements. Consistent with the restructured (and with the recently superseded) IESBA Code, no requirements and application material on professional skepticism are included in Agenda Item 5-A. Please see Section 6 below on developments on the possible expansion of the application of professional skepticism to non-assurance engagements.</p>
<p>5.3 Independence</p>	
<p>Clarification of the requirements relating to objectivity, and disclosure of non-independence, in ISRS 4400. This will involve liaison with the IESBA.</p>	<p>Para. A6 of Agenda Item 5A clarifies that the IESBA Code requires the practitioner to comply with the principle of objectivity.</p> <p>Para. 15 and A6-A7 of Agenda Item 5A address disclosure of non-independence.</p> <p>Section 4 of this paper provide further details on these issues, including an update on the Task Force’s liaison with the IESBA.</p>
<p>5.4 Terminology</p>	
<p>Clarification of what constitutes appropriate, or inappropriate, terminology to avoid unclear and misleading</p>	<p>The requirement for the agreed-upon procedures and findings to be described in terms that are clear, not misleading, and not subject to varying interpretations is reflected in para. 17(e) of Agenda Item 5A.</p>

terminology being used in AUP reports.	Examples of potentially inappropriate terminology, and the steps a practitioner may take to address circumstances in which the terminology may be unclear, misleading or subject to varying interpretations are included in para. A15-A17 of Agenda Item 5A.
5.5 Non-Financial Information	
Clarification that non-financial information is within the scope of ISRS 4400 and developing requirements and application material on acceptance considerations.	<p>Para. 2 of Agenda Item 5A clarifies that AUP engagements may be performed on financial and non-financial information, and para. A1 provides examples of non-financial information on which an AUP engagement may be performed.</p> <p>Requirement for the engagement team (and if applicable, the practitioner’s expert) to collectively have the competence to perform the engagement [regardless of whether the engagement deals with financial or non-financial information] is set in Engagement Level Quality Control – see para. 13(b)(ii) of Agenda Item 5A.</p>
5.6 Using the Work of an Expert	
Developing new requirements and application material to address the use of the work of an expert in an AUP engagement, including the practitioner’s responsibilities when using the work of an expert and consideration of whether it is appropriate to include references to an expert in an AUP report.	<p>Requirements and application material dealing with the use of a practitioner’s expert are included in para. 23 and A26-A27 of Agenda Item 5-A. Further, references to the practitioner’s expert are included in:</p> <ul style="list-style-type: none"> • Para. 13(a) and 13(b)(ii) in the context of engagement level quality control; • Para. A10 in the context of involving the practitioner’s expert in discussing the procedures to be performed; • Para. 18(f) in the context of agreeing the procedures to be performed by the expert; and • Para. 25(g) in the context of reporting on the procedures performed by the practitioner’s expert.
5.7 Format of AUP Report	
Include a limited number of illustrative AUP reports to illustrate the changes that have been made in the revisions to ISRS 4400.	2 illustrations of the AUP engagement reports are provided in Appendix 2 of Agenda Item 5A.
5.8 AUP Report Restriction and How This is Presented in the AUP Report	
Clarification of those situations when an AUP report may be provided to a party who is a non-signatory to the engagement	Para. 17(a) of Agenda Item 5A sets out the precondition for the engaging party and intended user(s) to have a clear understanding of the procedures to be performed. Para. A12 clarifies that the AUP report may be provided to a party that is not a signatory to the engagement agreement and provides examples of how the

<p>agreement, and developing requirements on inclusion of a statement in the AUP report regarding the intended user(s) of the AUP report and application material on restricting the AUP report.</p>	<p>practitioner can satisfy the precondition in para. 17(a) if the intended user(s) is not a signatory to the engagement agreement.</p> <p>Para. 25(k) of Agenda Item 5A requires the AUP report to identify the purpose of the AUP report and include an alert that the report may not be suitable for other purposes. Para. A29 provides guidance that the practitioner may include a restriction on the use or distribution of the AUP report (depending on law or regulation). This approach is consistent to that taken in para. 14 and A20-A21 of ISA 800⁷.</p>
<p>5.9 Recommendations Arising from the Performance of AUP Engagements</p>	
<p>Clarification of how such recommendations can be distinguished from the actual AUP report.</p>	<p>The Task Force has developed a requirement for recommendations (or any other engagements being undertaken at the same time as the AUP engagement) to be clearly distinguished from the AUP report and an application paragraph on how this could be done in para. 29 and A35 of Agenda Item 5A.</p>
<p>5.10 Other Significant Issues Identified in the Project Proposal</p>	
<p>Other significant issues identified in the Project Proposal include:</p> <ul style="list-style-type: none"> • Documentation — Development of requirements and application material dealing with documentation of the AUP engagement. • Linkage with ISQC 1⁸ — Clarification of the linkage between the ISRS 4400 (Revised) and ISQC 1. • Criteria for accepting AUP engagement — Development of requirements and application material dealing with criteria such as whether the 	<p>Requirements or application materials developed by the Task Force to address the other significant issues identified in the Project Proposal are as follow:</p> <ul style="list-style-type: none"> • Documentation – Para. 27-28 and A33-A34 of Agenda Item 5A set out the requirements and application material on documentation. These paragraphs are derived from para. 9 and A12 of ISA 230⁹. • Linkage to ISQC 1 – Para. 3 of Agenda Item 5A clarifies that ISQC 1 is applicable to an AUP engagement, and para. 25(d) requires the AUP report to include a statement that the firm applies ISQC 1. The requirement to reference ISQC 1 in the report is derived from para. 69(i) of ISAE 3000¹⁰. • Criteria for accepting AUP engagements – Para. 17 of Agenda Item 5A sets out the criteria for accepting an AUP engagement.

⁷ ISA 800, *Special Considerations — Audits of Financial Statements Prepared in Accordance with Special Purpose Frameworks*

⁸ ISQC 1, *Quality Control for Firms That Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*

⁹ ISA 230, *Audit Documentation*

¹⁰ ISAE 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

<p>procedures are capable of being objectively determined and resulting in factual findings.</p>	
<p>5.11 Other Matters</p>	
<p>Other matters raised by respondents to the Discussion Paper</p>	<p>In response to other matters raised by respondents to the Discussion Paper, the Task Force has:</p> <ul style="list-style-type: none"> • Included a requirement on dating the AUP report – please see para. 26 of Agenda Item 5A; and • Considered a requirement to obtain written representations, but decided not to include such a requirement for the following reasons: <ul style="list-style-type: none"> ○ The engaging party may not be the responsible party. In such cases, it may not be practicable for the practitioner to obtain representations from the responsible party. ○ Representations are intended to serve as evidence to support a practitioner’s opinion or assurance conclusion. Since an AUP engagement is not an assurance engagement, the Task Force does not see a need for the practitioner to obtain representations in an AUP engagement (although the Task Force understands that representations are sometimes obtained in practice). ○ Acknowledgement of the engaging party’s responsibilities is already addressed in agreeing the terms of engagement.

<p>Matters for IAASB Consideration</p> <p>4. The IAASB is asked for its views on the Task Force’s proposed dispositions of the issues identified in the Project Proposal.</p>
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6. Developments That the Task Force is Monitoring and Other Activities of the Task Force

16. Since the IAASB’s approval of the project proposal to revise extant ISRS 4400, the Task Force has undertaken a number of activities, including:
- Monitoring developments that may impact ISRS 4400; and
 - Performing limited outreach and other activities to further understand how AUP engagements are used.

17. The Task Force is actively monitoring developments on:
 - The IESBA's consideration of further revisions to the Code of Ethics that may affect the application of Professional Skepticism to non-assurance engagements; and
 - The IAASB's revisions to ISQC 1.
18. The Task Force understands that the IESBA has had some preliminary discussions on potentially expanding the application of professional skepticism to non-assurance engagements. The Task Force will continue to liaise with the IESBA and the IAASB's Professional Skepticism subgroup on this development.
19. The Task Force understands that an Exposure Draft on a revised ISQC 1 is expected to be issued in Fall 2018. A member of the AUP Task Force and a technical advisor on the AUP Task Force are also serving as member and technical advisor on the ISQC 1 Task Force. The AUP Task Force will leverage this cross membership to track the progress on ISQC 1, and will develop updated requirements and application material that reference the revised ISQC 1 as the ISQC project progresses.
20. The Task Force has also reached out to staff of the Institute of Chartered Accountants of England and Wales (ICAEW) working with government entities on the use of AUP engagements in relation to the need for accountability around funding and grants. The issues identified by ICAEW staff are consistent with those identified by respondents to the Discussion Paper.
21. Finally, the Task Force notes that the International Federation of Accountants' Small-and-Medium-Practices Committee has issued a publication on agreed-upon procedures titled [Agreed-Upon Procedures – Growth Value Opportunities](#).

Minutes of the September 2017 Board Meeting

Agreed-Upon Procedures Engagement

The Board discussed the feedback 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*](#), as well as the project proposal to revise ISRS 4400.¹¹

The Board unanimously approved the project proposal subject to clarifications around:

- The use of judgment. It was also suggested to link the use of professional judgment to recommendations arising from the performance of AUP engagements.
- The practitioner's independence in an AUP engagement. It was suggested to describe independence from a 'conflict of interest' perspective and to explain the importance of objectivity in case independence is not required.
- The report of factual findings, including the restriction of use of the report of factual findings. It was suggested to clarify that the basic model of factual findings will not be changed, and to elaborate more what the AUP Task Force intends to do on the restriction of use of the report of factual findings.
- The documentation required in an AUP engagement. The AUP Task Force was encouraged to clarify how the documentation in an AUP engagement can be enhanced.
- How the project will address the expectation gap between users of the report of factual findings and practitioners. It was suggested to include instances where the use of an AUP engagement would not be appropriate, similar to how this is addressed in ISAE 3000 (Revised).¹²
- The link between ISQC 1 and ISRS 4400.

Furthermore, the Board noted support for the use of staff from a national standard setter (NSS) to progress the project.

IAASB CAG CHAIR REMARKS

Mr. Dalkin noted that the IAASB CAG was very supportive of this project given its importance for SMPs and the public sector. The CAG also highlighted areas where the AUP Task Force should focus in the revision of ISRS 4400, including the practitioner's independence and the restriction of use of the report of factual findings.

PIOB REMARKS

Ms. Stothers was of the view that it is in the public interest to revise ISRS 4400, especially given the importance to SMPs. She supported staffing the project with staff from a NSS and emphasized the importance of further consideration of clear documentation requirements.

¹¹ International Standards on Related Services (ISRS) 4400, *Engagements to Perform Agreed-Upon Procedures Regarding Financial Information*

¹² International Standards On Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

WAY FORWARD

The AUP Task Force will address the suggested clarifications on the project proposal for submission to the Steering Committee and will commence its deliberations to address the issues identified, with the view to come back to the Board for discussions on the proposals for revision in 2018.