

# Supplement to Agenda Item 6A-1

**EER Assurance: Destination of material from June 2019 IAASB Issues Paper (Agenda Item 8 of June 2019 meeting) in phase 2 drafting**

## **Chapter 3 / Challenge 1: Determining the Scope in an EER Assurance Engagement**

<b>June Board Meeting EER Issues Paper</b>	<b>Suggested destination and treatment of June Issues Paper content</b>
<p><b>Introduction</b></p> <p>8. The 2016 Discussion Paper (the “DP”) described, in paragraphs 96 to 101, various challenges that may arise in establishing strong governance over the preparation of EER reports, which are related to certain differences in the nature of EER reports compared to financial statements. These differences were noted to include:</p> <ul style="list-style-type: none"> <li>a) Broader subject matter, users and purpose – EER reports may address a wider range of subject matters and be used by a broader and more diverse group of intended users for a more diverse range of purposes;</li> <li>b) Broader scope of governance, internal control and competence – Broader subject matter, users and purpose may necessitate a broader scope of reporting processes, controls and oversight, broader subject matter competence, and a greater need for the preparer to use experts in designing and operating EER reporting systems;</li> <li>c) Less maturity in governance and control of the subject matter – The underlying subject matter may be less deeply-embedded in the entity’s strategic and operational processes, the entity’s management and those charged</li> </ul>	<p>Introduction (paragraphs 8 to 14) to the Issues Paper sets the scene and summarizes past approach agreed with the Board. This material is not included in the guidance, but the ‘themes’ of EER reporting together with examples of various types of EER reports are included in the introduction/Chapter 1 and referenced from other chapters throughout the guidance.</p> <p>Before finalizing combined phase 1 and 2 draft guidance, the Task Force to check that all the identified issues have been covered.</p>

<p>with governance may be less experienced in such matters, and the design of reporting processes (including information systems), controls and oversight may be less mature;</p> <p>d) Lack of availability of suitable criteria – Relevant aspects of the underlying subject matter, and suitable measurement or evaluation criteria, often are not adequately addressed in established reporting frameworks, developing them may be highly judgmental for entities, and in doing so (the entity’s ‘materiality process’) the entity will need to ensure that such judgments reflect the user perspective appropriately; and</p> <p>e) Subject matter information is more qualitative, subjective, future-oriented, predictive and hypothetical – EER reports are more likely to include information that is more qualitative (descriptive or evaluative), subjective, future-oriented, predictive and hypothetical and the criteria used for their measurement or evaluation may be less well-developed or accepted and less reliable.</p> <p>9. The DP noted that these challenges may result in difficult acceptance judgments in a number of respects, or in the costs outweighing the benefits for full scope assurance engagements. It also noted that lesser than full scope assurance engagements might be considered in these circumstances, subject to the preconditions being present including that there is a rational purpose for such an engagement. However, the necessary considerations appeared complex for many practitioners and were not always well understood.</p> <p>10. The DP noted that ISAE 3000 (Revised) (“the Standard”) already enables considerable flexibility in the scope of assurance engagements relating to EER reports. For example, the scope of an assurance engagement may be limited to parts of the report (such as those that do not give rise to some of the challenges referred to above), or it may be possible to overcome some of these challenges, for example through</p>	
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<p>establishing entity-developed criteria.</p> <p>11. Considering the stakeholder feedback to the DP, the Board agreed to provide guidance on addressing the difficult acceptance judgments for the practitioner in determining whether it would be possible to accept an assurance scope narrower than the EER report, including guidance that addresses:</p> <ul style="list-style-type: none"><li>a) Whether the preconditions for an EER assurance engagement have been met;</li><li>b) Factors that should be considered when determining whether to accept different types of assurance engagements (limited or reasonable);</li><li>c) Whether an assurance engagement over a complete EER report should be accepted when governance and controls are developing;</li><li>d) Cost considerations;</li><li>e) The use of experts by management and practitioners; and</li><li>f) The other matters, identified in paragraph 8 above, relating to difficult acceptance judgments that may result from challenges in establishing strong governance over the preparation of EER reports compared with financial statements (the table in Appendix 1 challenge 1: Determining the Scope of an EER Assurance Engagement Can Be Complex sets out further detail).</li></ul> <p>12. The Task Force initially identified the following aspects of guidance as being needed to address this challenge and discussed these with the Board at the March 2019 Board meeting:</p> <ul style="list-style-type: none"><li>a) Understanding how to apply the concept of a rational purpose;</li><li>b) The need to identify and understand the information</li></ul>	
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<p>needs of the EER report's intended users;</p> <ul style="list-style-type: none"><li>c) Responding to possible expectation gaps, particularly for limited assurance engagements or where the scope of the assurance is very narrow (for example, only a few indicators such as Greenhouse Gas emissions);</li><li>d) Responding to the tendency of some preparers to want the scope to be the areas that are easily subject to an assurance engagement (perhaps such that an assurance report is obtained for a low cost, or because the processes and systems over some aspects of the EER are immature or developing, or because there is an incentive to report only on particular areas because it increases the entity's ratings in the marketplace if assurance has been obtained), rather than the areas that would most significantly assist intended users' decision-making;</li><li>e) Whether it is appropriate for the assurance scope to include different areas each year on a 'rolling program' so that over several years all areas are covered;</li><li>f) Setting the scope narrower than a whole report needs to be done with reference to specific aspects of the underlying subject matter and the related elements and criteria, not to specific aspects of the subject matter information; and</li><li>g) Limited assurance engagements are often performed where the system of internal control or the availability of evidence would not support a reasonable assurance engagement, however poor internal controls might suggest a need for reasonable assurance if their weaknesses increase the risk of error in the EER report.</li></ul> <p>13. The Board generally supported the aspects of guidance initially identified by the Task Force to address this challenge, and additionally suggested several more detailed points relating to the aspects of guidance identified by the Task Force. These</p>	
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<p>included:</p> <ul style="list-style-type: none"> <li>a) Emphasizing the importance of grounding an EER report in its rational purpose, and of understanding the needs of intended users of the report.</li> <li>b) Suitable criteria, including the reasons for exclusions, are critical to the scoping decisions.</li> <li>c) The importance of liaison and outreach with preparers or those reporting on the EERs.</li> </ul> <p>14. Some initial draft guidance on agreeing the scope of an EER engagement was developed during phase 1 of the project, but it was recognized that the guidance needed to be further developed in phase 2, in particular in relation to the different considerations that might apply to an assurance engagement over an entire EER report, and an assurance engagement covering a narrower scope such as specific measures or indicators in isolation.</p>	
<p><b>Context</b></p> <p>15. In traditional financial reporting, reporting frameworks (e.g. IFRS) specify the underlying subject matter and its elements that should be reported, and this is widely understood by preparers, users and practitioners. EER is more difficult as underlying subject matters are diverse, are generally less comprehensively specified by the large number and variability of EER reporting frameworks and are of relatively differing interest to a wide range of stakeholders.</p> <p>16. Where an EER framework does not specify what topics and related elements would assist the decision-making of the intended users of the report, the criteria may not be considered to be suitable on their own as they may lack relevance or completeness.<sup>1</sup> Preparers apply a materiality process to make</p>	<p>This material (15-19) is covered in the draft guidance Chapter 3 with some modifications to the wording.</p>

<sup>1</sup> Extended External Reporting (EER) Assurance IAASB Consultation Paper (February 2019) paragraph 127

judgments about what topics and related elements are to be included in the EER report,<sup>2</sup> effectively developing the criteria further such that they result in subject matter information that assists the decision-making of the intended users.<sup>3</sup> This can be challenging for both a preparer making these judgments and for a practitioner reviewing their appropriateness, when both the intended users and their information needs can be diverse and may result in reporting over a broad range of subject matters or a limited number of performance indicators in a particular subject matter area. This is discussed in further detail in Chapter 8: *Considering the Entity's 'Materiality Process'* of the February 2019 Consultation Paper (the "CP").

17. It is important to distinguish the different functions of the materiality process:
- a) determining or developing the criteria to be used to measure the underlying subject matter and report the subject matter information, and
  - b) scoping, which relates to determining the subject matter information to be assured (and in what depth); both scoping and the 'materiality process' differ from the materiality considerations applied by the practitioner in planning and performing the engagement and assessing misstatements. These considerations relate to omissions from, or misstatements within, the scope of the information included in the EER report that is determined to be the subject matter information ('SMI'), which is the information to be assured, for the engagement.
18. The CP, in paragraph 55, discusses that the scope of an EER assurance engagement can be an entire report or only part(s) of it, provided that the preconditions in paragraph 24 of the Standard are met. If considering a particularly narrow scope for the assurance engagement, careful consideration may be

<sup>2</sup> Extended External Reporting (EER) Assurance IAASB Consultation Paper (February 2019) paragraph 125

<sup>3</sup> Extended External Reporting (EER) Assurance IAASB Consultation Paper (February 2019) paragraph 127

<p>needed as to whether the preconditions are present, including that the engagement has a rational purpose.</p> <p>19. As discussed in paragraph 49 of the CP, while the meaning of the term ‘rational’ is not explicitly addressed in the Standard, an assurance engagement may be considered to have a rational purpose if the practitioner’s conclusion is designed “to enhance the degree of confidence of the intended users about the subject matter information”. Therefore, in considering whether the engagement has a rational purpose, the scope of the assurance engagement needs to be considered from the point of view of the user and what would enhance their confidence about the subject matter information.</p> <p>20. In considering the scope of the assurance engagement, two dimensions are relevant:</p> <ul style="list-style-type: none"> <li>a) The breadth of the SMI for the engagement (which is the information in the EER report that is to be assured), and therefore the breadth of the underlying subject matter (“USM”) and applicable criteria (“ACR”) from which that SMI has been prepared. The SMI may be all, or less than all, of the information included in the EER report; and</li> <li>b) The depth of the assurance to be obtained by the practitioner (i.e. the quantity and quality of evidence that is needed), which is linked, amongst other matters, to the level of assurance (limited or reasonable) for the engagement.</li> </ul> <p>These matters are proposed by the preparer, considered by the practitioner in determining whether the preconditions are present, based on a preliminary knowledge of the expected engagement circumstances, and determined by agreement between the preparer and the practitioner on acceptance of the engagement.</p>	
<p><b>Breadth of the subject matter information to be assured</b></p>	<p>Most of the material in paragraphs 21-40 is included in Chapter 3 of</p>

<p>21. Where the SMI for the engagement is less than all of the information included in the EER report, the ACR and USM for the engagement should also be correspondingly narrower in scope than the criteria and underlying subject matter information that would have been applicable if all of the information in the EER report was to be assured.</p> <p>22. Irrespective of whether the scope of the engagement is all of, or less than all of, the information included in the EER report, there should be a coherent relationship between the SMI, ACR and USM for the engagement because the SMI for the engagement should result from the proper application of the ACR for the engagement to the USM for the engagement. The coherence of this relationship should be considered when establishing whether the preconditions for assurance are present.</p>	<p>the draft guidance but in summarized form/using simpler terminology and examples. The discussion in 23 is not fully included as it is considered quite theoretical. May be useful for the Supplement, but it is probably sufficiently covered/illustrated in the draft guidance.</p>
<p><b>Linking underlying subject matter, criteria and subject matter information to be assured</b></p>	
<p>23. Considering the coherence of the relationship between the USM, ACR and SMI in the circumstances of the engagement means that:</p> <ul style="list-style-type: none"> <li>a) The preconditions are considered within the intended scope (narrow or broad) of each of these elements of the EER assurance engagement;</li> <li>b) <u>When the scope of the engagement is narrower than all</u> of the information included in the EER report, the USM and ACR are not the same as the criteria and underlying subject matter that would have been applicable in an engagement where the SMI was all of the information included in the EER report.</li> <li>c) In agreeing the scope of the engagement, changes in any of the three elements (USM, ACR or SMI), from those that would have been applicable in an engagement where the SMI was all of the information included in the EER report, would necessitate changes in each of the others.</li> <li>d) The scope of the engagement cannot be determined</li> </ul>	

<p>simply by identifying criteria and underlying subject matter which would have been suitable and appropriate for the preparation of all the information included in the EER report, and then selecting only part(s) of the information included in the EER report as the SMI for the engagement. It would also be necessary to identify the corresponding part(s) of the ACR and USM that bear an appropriately coherent relationship to the selected SMI. It would then be necessary to determine whether those part(s) of the ACR and USM are suitable and appropriate and whether the other preconditions are present in the context of the proposed narrow scope and other circumstances of the engagement.</p> <p>e) Selecting only those parts of the information included in the EER report that are easier to assure or that present the entity in a favorable light (sometimes referred to as 'cherry-picking') would not be appropriate unless the selected SMI, ACR and USM have an appropriately coherent relationship and the preconditions for acceptance of the proposed assurance engagement are present; and</p> <p>f) Information in the EER report that is outside the established scope of the subject matter information is considered to be 'other information', which the practitioner is required to read to identify material inconsistencies, if any, with the subject matter information or the assurance report.</p> <p>24. The Task Force is of the view that, when developing the guidance, it will be helpful to illustrate these concepts through the use of a number of examples.</p> <p>25. An overarching principle in the Standard is that criteria developed by the entity would not be suitable if they result in subject matter information or an assurance report that is misleading to the intended users.<sup>4</sup></p>	
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<sup>4</sup> ISAE 3000 (Revised) paragraph A50

26. Criteria need to be made available to the intended users to enable them to understand how the underlying subject matter has been measured or evaluated. Paragraphs A51-A52 of the Standard describe ways in which this can be done.
27. Practitioners also need to assess whether the preparer has made the criteria sufficiently freely accessible by the intended users and described them in sufficient detail and with sufficient clarity that their essential nature can be said to be “available”<sup>5</sup> to the intended users. Practitioners also need to consider whether the presentation and disclosure of the descriptions of the criteria made available are adequate to enable the intended users to understand the scope of what has been assured and the reasons for the narrower scope of the engagement.

**Applying the concept of a rational purpose**

28. In considering whether the preconditions for assurance are met, in addition to considering whether the underlying subject matter is appropriate and the criteria are suitable, the practitioner is required to consider whether the engagement has a rational purpose,<sup>6</sup> i.e. it is designed to enhance the degree of confidence of the intended users about the subject matter information. In doing so, the practitioner may need to consider not only the ‘materiality process’ (i.e. the further development of the criteria by the preparer, where the criteria in the framework are not sufficiently developed to be suitable) the preparer has undertaken in respect of the USM for the engagement but also the preparer’s wider ‘materiality process’ undertaken to develop criteria for the preparation of any part(s) of the information included in the EER report not within the scope of the engagement. This would enable the practitioner to consider matters such as:
- a) Whether there may be omissions of relevant parts of the underlying subject matter from the SMI, and whether such

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<sup>5</sup> EER Assurance – Issues Paper IAASB Meeting, June 18-23, 2018

<sup>6</sup> ISAE 3000 (Revised) paragraph 24(b)(vi)

omissions call into question the rational purpose of the engagement; and

- b) Whether and how the SMI and any other part(s) of the information included in the EER report is used in the preparer's own decision-making processes or, if not, whether the preparer may have been biased in selecting as SMI only those parts of the EER report that are easily subject to an assurance engagement or that present the entity in a positive way. As the preparer is accountable to its stakeholders for its decisions, if the information relating to those decisions is important to users, then it may be expected that the preparer would be using that information in its own decision-making. Likewise, if the company is using the information in its decision-making, then it may be reasonable to expect that a user would be interested in that information.

29. In considering these matters in a more complex engagement, a high level of assurance competence may be needed to apply professional judgment and professional skepticism and to take actions that are appropriate in the circumstances. The competence needed in applying professional judgment and professional skepticism is discussed further in relation to challenge 8: *Exercising Professional Skepticism and Professional Judgment* and challenge 9: *Obtaining the Competence Necessary to Perform the Engagement*.

Considering whether a narrower scope engagement has rational purpose

30. When considering whether a narrower scope engagement has a rational purpose, the practitioner's consideration of any wider 'materiality process' applied by the preparer may need to be at a different level of detail than where the intended scope of the engagement is the entire EER report. In a narrower scope assurance engagement, where relevant, the purpose of considering the wider 'materiality process' is to identify matters that have not been, but should have, been included within the narrower scope, rather than to focus on the development of

suitable criteria for the other information included in the EER report.

31. Entities producing EER reports typically implement gradual changes to their governance and controls to support such reporting as it becomes more established and formal.<sup>7</sup> To accept an assurance engagement, the practitioner is required to determine, amongst other matters, that the preparer has a reasonable basis for the subject matter information as part of the precondition that the roles and responsibilities of the preparer are suitable.<sup>8</sup> Where an entity's governance and controls over EER are in the process of developing, the preparer may not yet have a reasonable basis for reporting on all aspects of the underlying subject matter/s or for all the subject matter information that is included in the EER report. There may therefore be challenges to being able to meet the preconditions for assurance in relation to some aspects of the EER report. Accordingly, when the entity is in the less mature stages of that process, it may not be appropriate for the practitioner to accept an engagement to assure the whole EER report. Considerations in relation to the entity's internal control and governance and oversight of the reporting process are discussed further in the CP Chapter 6: *Considering the System of Internal Control*.
32. Although an engagement to assure all of the information included in its EER report may not meet the preconditions, management may wish to obtain assurance on those areas for which an assurance engagement could meet the preconditions, and to disclose in the EER report that they are working on developing the governance and reporting processes and systems to extend the scope of assurance in other areas in due course. The narrower scope engagement would nevertheless need to have a rational purpose. In assessing whether there is a rational purpose the practitioner will need to consider carefully

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<sup>7</sup> Extended External Reporting (EER) Assurance IAASB Consultation Paper (February 2019) paragraph 59

<sup>8</sup> ISAE 3000 (Revised) paragraphs 24(a) and A39

the reasons for the preparer wishing to include only certain part(s) of the information included in the EER report within the scope of assurance, and whether those reasons are appropriate. The practitioner may also consider whether those reasons are suitably disclosed. However, disclosure alone would not justify acceptance of such an engagement if the reasons for the narrower scope to be assured are inappropriate or the proposed engagement lacks a rational purpose.

33. Where the SMI is less than all the information included in the EER report, as noted in paragraph 21 above, the preconditions are considered in the context of the narrow scope of, and coherence of the relationship between, the ACR, USM and SMI for the engagement.
34. In the circumstances where the entity's governance and controls over EER are in the process of developing, it may be expected that more part(s) of the information included in the EER report would fall within an evolving (building blocks approach to the) scope of the SMI, for successive EER assurance engagements, as the entity's EER governance, reporting processes and systems evolve to enable the preconditions to be met on other parts of the information included in its EER report. However, it may be necessary for the preparer and the practitioner to consider how such an approach may affect comparability of the SMI over time, and whether related criteria for associated presentation and disclosure are suitable and will be available to the intended users to be able to understand how the USM has been measured or evaluated, including the implications of how the SMI has changed over time. Where the SMI is less than all the information included in the EER report, the practitioner will need to give careful consideration to the 'other information' to determine whether there may be inconsistencies between the SMI and other information included in the EER report.
35. Where the entity has given as its reasons for a narrow scope engagement that it is in the process of developing its governance and controls over EER, but it does not make any attempt to include further parts of the information in the EER

report within the scope of the assurance engagement in later periods, that may (unless user information needs have changed) call into question the entity's reasons for reporting the subject matter information and whether the assurance engagement has a rational purpose.

A rolling program of assurance

36. Sometimes an entity may wish to obtain assurance, on a rolling basis, over selected but different parts of the EER in successive periods, rather than on the entirety of the information in the EER report in each reporting period. It is important to make a distinction between an assurance engagement, on a rolling basis, over selected parts of the EER report that vary from period to period and the performance of assurance procedures on a selective, rolling basis once the SMI has been agreed. The former relates to determining the scope of the assurance engagement and assessing the preconditions for assurance, and is discussed further below. The latter relates to obtaining evidence relating to the SMI after the acceptance decision has been made.
37. Where the preparer wishes to have an assurance engagement, with the scope determined on a rolling basis, over a narrower part of the subject matter information than has been included in EER report, the practitioner needs to consider whether there is a rational purpose for doing so. In considering whether there is a rational purpose, the practitioner applies professional judgment and professional skepticism in understanding the reasons for the preparer proposing a rolling program of assurance, and whether those reasons are appropriate when considered from the perspective of intended users. For example, the entity may consider that reporting on all aspects of the subject matter information included in the EER report every year may not be cost effective, and that a rolling program of reporting may nevertheless meet the needs of intended users. These may be reasonable considerations, whereas selectively including only those aspects of the USM that portray the entity in a positive light or because they are easier to assure may not

<p>be likely to enhance user confidence in the SMI.</p> <p>38. Where such a rolling scope program is considered to result in successive assurance engagements that each has a rational purpose, the criteria for presentation and disclosure may be particularly important to allow the intended users to understand both the reasons for the approach the preparer has taken and the boundaries of the information in the EER report that has been assured.</p> <p>39. Where an evolving or rolling scope program is considered to result in successive assurance engagements that each has a rational purpose, the coherence of the relationship between the USM, ACR and SMI of those engagements and the presence of the preconditions are considered for those engagements, as discussed in paragraph 22 above. For example, if the entity determines that it wishes to obtain assurance on a rolling basis by geography relating to aspects of the subject matter information included in its EER report, then the ACR are applied to the USM related to the selected geographical region to result in the SMI. Consideration of the suitability of the criteria will include whether the criteria for associated presentation and disclosure are suitable and will be available to the intended users to allow them to understand both the reasons for the rolling program of assurance and the boundaries of the subject matter information that has been assured.</p> <p>40. Where an evolving or rolling program of assurance engagements is adopted by a preparer and accepted by a practitioner, users may expect it to be followed consistently as designed. However, the nature, extent and timing of the consideration the practitioner gives to the 'other information' may also change from period to period as, effectively, the information included in the EER report related to the geographical regions not within the scope of assurance in a particular period become 'other information'. Consideration may also need to be given to whether the engagement circumstances have changed such that a rolling scope program of assurance may no longer be appropriate. The Task Force</p>	
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<p>plans to use examples in the guidance to illustrate the thought processes that might be applied by a practitioner in relation to evolving or rolling scope programs of assurance engagements.</p>	
<p><b>Depth of assurance to be obtained – the level(s) of assurance</b></p> <p>41. The second dimension of scope to consider is the depth of the assurance to be obtained, which, at least in part, is influenced by the agreed level of assurance (limited or reasonable), and is related to the nature, timing and extent of procedures the practitioner performs as part of their evidence-gathering procedures. The Standard requires that a rational purpose includes, in the case of a limited assurance engagement, that the practitioner expects to be able to obtain a meaningful level of assurance.<sup>9</sup></p> <p>42. As the level of assurance that the practitioner plans to obtain is not ordinarily susceptible to quantification,<sup>10</sup> determining what is ‘rational’ in the context of the level of assurance to be obtained may require considerable skill in the exercise of professional judgment and professional skepticism. Across the range of limited assurance engagements, what is meaningful can vary from just above assurance that is likely to enhance the intended users’ confidence about the subject matter information to a degree that is clearly more than inconsequential to just below reasonable assurance.<sup>11</sup> What is meaningful in a particular engagement represents a judgment within that range that is dependent on the particular circumstances of the engagement, including the information needs of intended users as a group, the criteria, and the underlying subject matter of the engagement.</p> <p>43. The Task Force is of the view that it may be helpful to consider the decisions regarding the level of assurance to be obtained in</p>	<p>Second dimension (depth) as discussed in paragraph 41 is included in the draft guidance but the rest of this material (42 – 47) is quite theoretical. Suggest this is useful for the Supplement, but it has not been included in the draft guidance. Thought process for evidence covered in Chapter 10, but further consideration to be given to how to differentiate better the work effort/nature of procedures for limited vs reasonable assurance.</p> <p>Paragraph 48 is included in draft guidance.</p>

<sup>9</sup> ISAE 3000 (Revised) paragraph 24(b)(vi)

<sup>10</sup> ISAE 3000 (Revised) paragraph A4

<sup>11</sup> ISAE 3000 (Revised) paragraph A5

a reasonable assurance engagement in a similar way.

44. In a reasonable assurance engagement, the practitioner reduces engagement risk – the risk that the practitioner expresses an inappropriate conclusion when the subject matter information is materially misstated – to an acceptably low level in the circumstances of the engagement as a basis for the practitioner’s conclusion.<sup>12</sup> Reducing engagement risk to zero is very rarely attainable or cost beneficial and, therefore “reasonable assurance” is less than absolute assurance. This is due to factors such as the use of selective testing, the inherent limitations of internal control, the fact that much of the evidence available to the practitioner is persuasive, rather than conclusive, the use of professional judgment in gathering and evaluating evidence and, in some cases, the characteristics of the USM when evaluated or measured against criteria.<sup>13</sup>
45. The Task Force believes that the practitioner’s judgment about the level of assurance that is appropriate in the engagement circumstances – which has consequences for the nature, timing and extent of assurance procedures – is not only relevant in terms of whether the practitioner agrees to perform a limited or reasonable assurance engagement. The Task Force considers that such a judgment is also relevant, in the context of the practitioner agreeing to perform either type of assurance engagement, in terms of whether the proposed level of assurance is likely to result in a conclusion that would justifiably enhance the degree of confidence of the intended users about the subject matter information to a level that is meaningful to the intended users, having regard to the corresponding level of engagement risk, in the circumstances of the engagement.
46. Generally, the greater the consequence to intended users of receiving an inappropriate conclusion when the subject matter is

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<sup>12</sup> ISAE 3000 (Revised) paragraph 12(a)(i)a

<sup>13</sup> ISAE 3000 (Revised) paragraph A14

<p>materially misstated, the greater the assurance that would be needed in order to be meaningful to them<sup>14</sup> and the lower the engagement risk the practitioner would be willing to accept in carrying out their assurance procedures. As discussed in paragraph 49 of the CP, in some circumstances, the intended users' need for assurance may even be so great that a reasonable assurance engagement is needed to obtain a meaningful level of assurance.</p> <p>47. What is an acceptably low level of engagement risk may vary according to the circumstances of the engagement. The practitioner may therefore consider what is an acceptably low level of engagement risk in the context of possible levels of assurance that could be obtained. Doing so may include considering the information needs of intended users as a group, the criteria, and the underlying subject matter of the engagement as well as the consequence to users of receiving an inappropriate conclusion in the circumstances of the engagement.</p> <p>48. The nature, timing and extent of procedures to be performed is discussed further in relation to challenges 6 &amp; 7: <i>Obtaining Assurance with Respect to Narrative Information and Obtaining Assurance with Respect to Future-Oriented Information</i>. However, the decision as to what is likely to be meaningful in terms of the appropriate level of assurance is considered as part of the acceptance decision when considering whether the preconditions are present, including that the practitioner expects to be able to obtain the evidence needed to support their conclusion.<sup>15</sup></p>	
<p><b>Other considerations</b></p> <p>49. As the level of assurance also relates to evidence-gathering, the Task Force proposes dealing with levels of assurance in greater detail, including considerations regarding systems of internal</p>	<p>These paragraphs do not need to be in the guidance, but the linkages between chapters/paragraphs will be made in the draft guidance.</p>

<sup>14</sup> ISAE 3000 (Revised) paragraph A7

<sup>15</sup> ISAE 3000 (Revised) paragraph 24(b)(iv)

<p>control, as part of developing the guidance in relation to challenges 6 &amp; 7: <i>Obtaining Assurance with Respect to Narrative Information</i> and <i>Obtaining Evidence with Respect to Future-Oriented Information</i>.</p> <p>50. The Task Force proposes developing guidance, in relation to challenge 10: <i>Communicating Effectively in the Assurance Report</i>, on how the decisions relating to the scope of the assurance engagement affect the number and form of the assurance conclusions.</p> <p>51. The Task Force's considerations regarding the use of experts by management and the practitioner are discussed in relation to challenge 8: <i>Exercising Professional Skepticism and Professional Judgment</i> and challenge 9: <i>Obtaining the Competence Necessary to Perform the Engagement</i>.</p>	
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