
Update on 2007 Revision to the Yellow Book

**AASHTO Administrative Subcommittee
Conference on Internal/External Audit**

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Gail Flister Vallieres

Session Objectives

- Explain the process being used to issue the 2007 Yellow Book
- Highlight major revisions in the January 2007 Revision of the Yellow Book
- Discuss the reasons for the changes and what these changes will mean for government auditors
- Discuss effective dates

2007 Yellow Book: Development of Issues

- Identified need for revising Yellow Book based on activities of AICPA, PCAOB, and other standard setters in Fall 2005
- Three Advisory Council meetings
- Frequent requests for feedback based on staff drafts
- June 2006 ED

Process for Analyzing Comments

- Comments received
 - 118 commenters
- Systematic review process to analyze every comment
 - All comments entered into an Access database
 - Collaborative team review of comments

January 2007 Revision

- 2007 revision supersedes the 2003 revision
 - Issued revision late January 2007
 - Contains final 2007 revision except for quality control and peer review sections
 - At same time issued exposure draft requesting comments on redrafted sections on quality control and peer review
 - Comments are due March 30, 2007
 - The complete, 2007 revision will be available after the quality assurance and peer review sections are finalized and incorporated into the standards
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Chapter 1

Use and Applicability of GAGAS

- Reinforced the key role of auditing in maintaining accountability and improving government operations
 - Clarified the standards through standardized language to define the auditors' level of responsibility and distinguish between requirements and additional guidance.
 - Added guidance on citing compliance with GAGAS in the auditors' report
 - Clarified and expanded the standards to recognize other sets of standards that can be used in conjunction with GAGAS
 - Retained the same types of government audits and attestation engagements, but updated and expanded the definitions and descriptions of performance audits and attestation engagements
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Chapter 1 **Use of Terminology**

Standardized language to define the auditor requirements

- **Consistent with SAS No. 102**
 - **Must** and **is required** indicate an unconditional requirement
 - **Should** indicates a presumptively mandatory requirement
 - Text not using the above conventions is considered explanatory material

Chapter 1 **Citing Compliance with GAGAS**

Citing GAGAS in auditors' report

- **Unmodified GAGAS compliance statement** – Audit was performed in accordance with GAGAS
- **Modified GAGAS compliance statement** –
 - Audit was performed in accordance with GAGAS, except for specific applicable standards that were not followed, or
 - Auditor was unable to and did not perform the audit in accordance with GAGAS

Chapter 1 **GAGAS and Other Standards**

Recognizing other sets of professional standards

- AICPA field work and reporting standards are incorporated by reference for financial statement audits
- PCAOB and IAASB standards can be used in conjunction with GAGAS for financial statement audits
- IIA standards can be used in conjunction with GAGAS for performance audits

Chapter 2

Ethical Principles in Government Auditing

Heightened emphasis on ethical principles

“Conducting audit work in accordance with ethical principles is a matter of personal and organizational responsibility. Ethical principles apply in preserving auditor independence, taking on only work that the auditor is competent to perform, performing high-quality work, and following the applicable standards cited in the audit report.”

Excerpt from paragraph 2.03

Chapter 2 **Ethical Principles**

Five principles

- Public interest
- Integrity
- Objectivity
- Proper use of government information, resources, and position
- Professional behavior

Chapter 3

General Standards

- Clarified and streamlined the discussion of the impact of professional services other than audit services (nonaudit services) and their impact on auditor independence
 - Stressed the critical role of professional judgment in complying with GAGAS
 - Expanded competence to emphasize its importance and relate it to key steps in performing an audit and reporting on the auditors' conclusions
 - Updated CPE requirements to incorporate April 2005 changes
 - Reexposed quality control and peer review sections
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Chapter 3: General Standards

Nonaudit Services

- Moved nonaudit services from “personal impairments” to “organizational impairments”
 - Created three distinct categories of nonaudit services and consolidated and streamlined the examples previously interspersed throughout the independence section
 - Nonaudit services that do not impair auditor independence
 - Nonaudit services that will not impair independence if supplemental safeguards are complied with
 - Nonaudit services that impair independence
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Chapter 3: General Standards

Independence

- Streamlined requirements for auditors regarding independence when using the work of a specialist
- Added that an externally imposed restriction on access to records, government officials, or other individuals needed to conduct the audit may impair external independence
- Added steps that audit organizations should take if an impairment to independence is identified after the audit report is issued

Chapter 3: General Standards

Continuing Professional Education

- Incorporated the revised CPE requirements that were issued in April 2005 (GAO-05-568G). Under these requirements
 - All auditors should complete every 2 years at least 24 hours of CPE that relates to GAGAS
 - All auditors involved in planning, directing, or reporting on GAGAS assignments **and** all auditors who charge 20 percent or more of their time annually to GAGAS assignments also should obtain at least an additional 56 hours of CPE that enhances the auditors' professional proficiency to conduct audits
 - Clarified CPE requirements to include internal specialists who are part of the audit organization and part of the team
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All Types of GAGAS Audits and Attestation Engagements

- Defined those charged with governance
- Added a requirement for controls over electronically maintained audit documentation
- Clarified and streamlined
 - Developing elements of a finding
 - Reporting confidential or sensitive information
 - Reporting views of responsible officials
 - Issuing and distributing reports

All Types of GAGAS Audits

The Role of Those Charged with Governance

- Have the duty to oversee the strategic direction and obligations related to the accountability of the entity
 - Because it may be unclear who is charged with governance functions, auditors evaluate organizational structure for directing and controlling operations to achieve the entity's objectives
 - Evaluation includes
 - How the entity delegates authority
 - How the entity establishes accountability for management personnel
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All Types of GAGAS Audits

Controls over Electronic Audit Documentation

- Whether audit documentation is in paper, electronic, or other media
 - The integrity, accessibility, and retrievability of the underlying information could be compromised if
 - Documentation is altered, added to, or deleted without auditors' knowledge
 - Documentation is lost or damaged
- For documentation retained electronically, the audit organization should establish information systems controls concerning the accessing and updating the audit documentation

All Types of GAGAS Audits

Developing Elements of a Finding

- Elements needed depend on the objectives of the audit
 - Finding is complete to the extent the audit objectives are satisfied
 - Auditor should plan and perform procedures to develop the elements of a finding that are relevant
 - Criteria
 - Condition
 - Cause
 - Effect or potential effect

All Types of GAGAS Audits **Reporting Confidential and Sensitive Information**

- If information is excluded from the auditors' report, auditors
 - Should disclose that certain information has been omitted and reason for the omission
 - May issue a separate report and distribute it to only persons authorized to receive it
- If subject to public records laws, auditors should
 - determine the impact of such laws on the availability of the separate report
 - determine whether other means of communicating would be more appropriate

All Types of GAGAS Audits

Reporting Views of Responsible Officials

- If the report discloses deficiencies in internal control, fraud, illegal acts, violations of provisions of contracts or grant agreements, or abuse, auditors should
 - Obtain and report views of responsible officials concerning
 - Findings, conclusions, and recommendations
 - Planned corrective actions
- Include in the report an evaluation of the comments
- If the audited entity does not provide comments, auditors may issue the report
 - Indicate that the audited entity did not provide comments

All Types of GAGAS Audits **Distributing Reports**

- Distribution of reports depends on
 - The relationship of the auditors to the audited organization
 - The nature of the information contained in the report
- Different requirements for
 - Government audit organizations (external)
 - Internal audit organizations in government
 - Public accounting firms

Changes Related to Internal Auditors

- Encouraged internal auditors to use IIA standards in conjunction with GAGAS
- Modernized the criteria for organizational independence for internal audit functions
 - Reporting audit results to those charged with governance
 - Access to those charged with governance
 - Sufficiently removed from political pressures
- Emphasized the importance of internal audit as part of the overall governance, accountability, and internal control
- Clarified that internal auditors may follow IIA standards to communicate results of the audit to parties who can ensure that the results are given due consideration

Chapter 4

Financial Audit Field Work

- Updated communications during planning
 - Clarified and streamlined the auditors' responsibilities for contract provisions or grant agreements
 - Clarified and streamlined the auditors' responsibilities in field work for abuse
 - Added a clear and prominent discussion on consideration of fraud and illegal acts
 - Updated GAGAS based on recent developments in financial auditing and internal control
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Chapter 4: Financial Audit Field Work

Communication During Planning

- Auditors are required to communicate their understanding of the services to be performed for each audit
 - Communication is required to be written to both management and those charged with governance
 - If not clear who are “those charged with governance,” the auditor should
 - Document the process followed
 - Document conclusions reached on the appropriate individuals to receive the auditor communications

Chapter 4: Financial Audit Field Work

Contract Provisions or Grant Agreements

- Auditors should design the audit to provide reasonable assurance of detecting misstatements that result from violations of provisions of contracts or grant agreements that could have a direct and material effect on financial statement amounts or other financial data significant to the audit objectives
- When auditors conclude that a violation of provisions of contracts or grant agreements has or is likely to have occurred, they should determine the effect on the financial statements as well as implications for other aspects of the audit

Chapter 4: Financial Audit Field Work

Abuse

- If the auditor becomes aware of indications of abuse that could be material, the auditor should apply audit procedures specifically to ascertain
 - Whether material abuse has occurred
 - The potential effect on the subject matter of the audit
 - However, because the determination of abuse is subjective, auditors are not required to provide reasonable assurance of detecting abuse
 - After performing additional work, auditors may discover that the abuse represents potential fraud or illegal acts
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Chapter 4: Financial Audit Field Work

Fraud and Illegal Acts

- Clarifies the existing standard but does not change auditors' responsibilities
 - Under both the AICPA standards and GAGAS, auditors have the following responsibilities
 - Plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud
 - Design the audit to provide reasonable assurance of detecting material misstatements resulting from illegal acts that could have a direct and material effect on the financial statements
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Chapter 4: Financial Audit Field Work

Audit Documentation

- Updated the standard to achieve consistency with SAS No. 103
 - The auditor should prepare audit documentation that enables an experienced auditor, having no previous connection to the audit, to understand
 - The nature, timing, and extent of procedures performed
 - The results of procedures performed and evidence obtained
 - How the audit evidence relates to the audit conclusions
 - The conclusions reached on significant matters
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Chapter 5

Financial Audit Reporting

- Updated reporting requirements for internal control deficiencies
 - Encouraged communicating, in the auditors' report, significant concerns, uncertainties, or other unusual events that could have a significant impact on the financial condition or operations
 - Increased transparency surrounding reporting on restated financial statements
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Chapter 5: Financial Audit Reporting **Internal Control**

Definitions of internal control deficiencies (consistent with SAS No. 112)

- **Significant deficiency** – a deficiency in internal control, or a combination of deficiencies, that adversely affects the entity’s ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity’s financial statements that is more than inconsequential will not be prevented or detected.

Chapter 5: Financial Audit Reporting

Internal Control

Definitions of internal control deficiencies (consistent with SAS No. 112)

- **Material weakness** – a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected

Reporting Internal Control Deficiencies

Old Definitions

New Definitions – SAS 112

| | |
|---|---|
| <p>Material weakness (GAGAS paragraph 5.14 and AU 325.15)</p> | <p>Material weakness</p> |
| <p>Reportable condition (GAGAS paragraph 5.13 and AU 325.02)</p> | |
| <p>Management letter comment (GAGAS paragraph 5.16)</p> | <p>Significant deficiency</p> |
| | <p>Other matters related to internal control</p> |

Chapter 5: Financial Audit Reporting **Fraud, Illegal Acts, Other Noncompliance, Abuse**

When auditors conclude that any of the following has occurred or is likely to have occurred, they should include in the audit report the relevant information about

- Fraud and illegal acts that are greater than inconsequential
- Material violations of contracts or grant agreements
- Material abuse

Chapter 5: Financial Audit Reporting **Management Letter**

- Determining whether and how to communicate is a matter of professional judgment
 - Illegal acts, violations of provisions of contracts or grant agreements, or abuse that is inconsequential
 - Internal control deficiencies that have an inconsequential effect on the financial statements
- Should be communicated in writing
 - Violations of provisions of contracts or grant agreements or abuse that have an effect that is less than material but more than inconsequential

Chapter 5: Financial Audit Reporting

Communicating Significant Matters

- Auditors may communicate the following matters when they become aware that such issues exist
 - Concerns or significant uncertainties about the fiscal sustainability of a government or program significant to the financial condition or operations
 - Unusual or catastrophic events that likely will have significant ongoing or future impact
 - Significant uncertainties
 - Any other matter that the auditor considers significant
 - Determining whether to communicate in the auditors' report is a matter of professional judgment
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Chapter 5: Financial Audit Reporting

Restatements - Increased Transparency

- Auditors should advise management to make appropriate disclosures when the auditors believe it is likely that previously-issued financial statements are misstated and the misstatement could be material (AU 561)
 - Under GAGAS, auditors have additional responsibilities in the following areas
 - Evaluate the timeliness and appropriateness of management's disclosure and actions to determine and correct misstatements in the previously-issued financial statements
 - Report on restated financial statements
 - Report directly to appropriate officials when the audited entity does not take the necessary steps
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Chapter 5: Financial Audit Reporting **Restatements - Increased Transparency**

Evaluating the timeliness and appropriateness of management's disclosures and actions (AU 561)

- Auditors should evaluate the timeliness and appropriateness of
 - management's disclosures to those likely to rely on the financial statements and
 - management's actions to determine and correct misstatements in previously-issued financial statements

Chapter 5: Financial Audit Reporting

Restatements - Increased Transparency

Evaluating the timeliness and appropriateness of management's disclosures and actions

Under GAGAS, auditors should also evaluate whether management

- Acted in an appropriate time frame after new information was available
- Disclosed the nature and extent of the known or likely material misstatements
- Disclosed whether specified information was in the entity's restated financial statements

Chapter 5: Financial Audit Reporting

Restatements - Increased Transparency

Report on restated financial statements

Auditors should perform audit procedures sufficient to reissue or update the auditor's report on the restated financial statements regardless of whether the restated financial statements are separately issued or presented on a comparative basis

- Explanatory paragraph includes
 - Disclosure that the previously-issued financial statements have been restated
 - Statement that previously-issued report should not be relied on and is replaced by a revised report
 - Reference to the notes that discuss the restatement
 - If applicable, reference to the report on internal control

Chapter 5: Financial Audit Reporting

Restatements - Increased Transparency

Report directly when the audited entity does not take the necessary steps

- Auditors should notify those charged with governance if the entity management
 - Does not act in an appropriate timeframe
 - Does not restate with reasonable timeliness
- Auditors should inform management that they will take steps to prevent further reliance on the auditors' report and advise those charged with governance to notify oversight bodies and funding organizations
 - If not notified, auditors should do this notification

Chapter 6

Attestation Engagements

Conforming changes have been made for the following items

- Definitions of internal control deficiencies
- Description of abuse
- Audit documentation
- Use of terminology to define professional requirements
- Reporting views of responsible officials and confidential and sensitive information
- Issuing and distributing reports

Chapters 7 & 8

Performance Audits

Enhanced performance audit standards that elaborate on the overall framework for high-quality performance audits including by

- Defining the level of assurance associated with a performance audit as providing reasonable assurance that auditors have sufficient, appropriate evidence to achieve the audit objectives and support findings and conclusions
 - Adding a section on the concept of significance
 - Adding a section on audit risk and specifically adding risk as a factor to be used in planning and the evaluation of evidence
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Chapters 7 & 8 **Performance Audits**

- Added a section describing the auditors' overall assessment of the collective evidence to support the findings and conclusions
- Added a section on information systems controls for the purpose of assessing audit risk and planning the audit

Chapters 7 & 8

Performance Audits

- Expanded the auditors' compliance with GAGAS in the performance audit report
- Clarified and streamlined auditors' responsibility for
 - Reporting the views of responsible officials
 - Reporting confidential and sensitive information
 - Issuing and distributing reports

Chapters 7 & 8 **Performance Audits**

Level of assurance in performance audits

- Performance audits that comply with GAGAS provide reasonable assurance that the evidence is sufficient and appropriate to support the auditors' findings and conclusions

Chapters 7 & 8

Performance Audits

Concept of significance in a performance audit

Significance is defined as the relative importance of a matter within the context in which it is being considered, including quantitative and qualitative factors. Such factors include the magnitude in relation to the subject matter of the audit, the nature and effect of the matter, the relevance of the matter, the needs and interests of an objective third party with knowledge of relevant information, and the impact of the matter to the audited program or activity.

Chapters 7 & 8 **Performance Audits**

Audit risk

Audit risk is the possibility that the auditors' findings, conclusions, recommendations, or assurance may be improper or incomplete as a result of factors such as evidence that is not sufficient and/or appropriate, an inadequate audit process, or intentional omissions or misleading information existed due to misrepresentation or fraud.

Chapters 7 & 8 **Performance Audits**

Audit risk

Auditors **must** plan the audit to reduce audit risk to an appropriate level for the auditors to provide reasonable assurance that the evidence is sufficient and appropriate to support the auditors' findings and conclusions.

Chapters 7 & 8 **Performance Audits**

Sufficient, appropriate evidence

Appropriateness is defined as a measure of quality of evidence that encompasses the relevance, validity, and reliability of evidence used for addressing the audit objectives and supporting findings and conclusions

Sufficiency is defined as a measure of quantity of evidence used for addressing the audit objectives and supporting findings and conclusions

Chapters 7 & 8

Performance Audits

Added a section describing the overall assessment of the collective evidence to support the findings and conclusions

- Assessment of evidence depends on the nature of the evidence, how it is used, and the audit objectives
- Evidence is sufficient and appropriate when it provides reasonable assurance supporting the findings or conclusions within the context of the audit objectives
- Evidence is not sufficient and appropriate when it
 - Carries an unacceptably high risk that it could lead to an incorrect or improper conclusion
 - Has significant limitations
 - Does not provide an adequate basis for addressing the audit objectives or supporting the findings and conclusions

Chapters 7 & 8

Performance Audits

Added a section on information systems controls for the purpose of assessing audit risk and planning the audit.
Information systems controls

- Consist of those internal controls that are dependent on information systems processing
 - Include general controls and application controls
 - Are significant to the audit objectives if auditors determine that it is necessary to assess the effectiveness of information system controls in order to obtain sufficient, appropriate evidence
 - If significant, auditors should assess the effectiveness of such controls by performing audit procedures
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Chapters 7 & 8: Performance Audits

Fraud

In planning the audit, auditors should assess risks of fraud occurring that are significant within the context of the audit objectives.

Auditors should

- Discuss fraud risks among the audit team
- Gather and assess information to identify risks of fraud that are significant within the scope of the audit objectives

When auditors identify factors or risks related to fraud that has occurred or is likely to have occurred that are significant within the scope of the audit objectives or that could affect the findings and conclusions, they should design procedures to provide reasonable assurance of detecting such fraud.

Chapters 7 & 8: Performance Audits

Abuse

- If an auditor becomes aware of indications of abuse that could be qualitatively or quantitatively significant to the program under audit, auditors should apply audit procedures specifically to ascertain
 - The potential effect on the program under audit within the context of the audit objectives
 - However, because the determination of abuse is subjective, auditors are not required to provide reasonable assurance of detecting abuse
 - After performing additional work, auditors may discover that the abuse represents potential fraud or illegal acts
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Chapters 7 & 8: Performance Audits

Legal and Regulatory Requirements, Contract Provisions or Grant Agreements

- Auditors should determine which laws, regulations, and provisions of contracts or grant agreements are significant within the context of the audit objectives and assess the risk that violations of those laws, regulations, and provisions of contracts or grant agreements could occur.
- Auditors should design and perform procedures to provide reasonable assurance of detecting instances of violations of legal and regulatory requirements or violations of provisions of contracts or grant agreements that are significant within the context of the audit objectives

Chapters 7 & 8: Performance Audits **GAGAS Statement**

GAGAS statement in auditor's report

When auditors comply with all applicable GAGAS requirements, they should use the following language in the report:

“We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.”

Chapters 7 & 8: Performance Audits

Discovery That Report Was Issued without Sufficient, Appropriate Evidence

- If after the report is issued, auditors discover the report was not supported by sufficient, appropriate evidence, they should communicate with
 - Those charged with governance
 - Appropriate officials of the audited entity
 - Appropriate officials of the organizations requiring or arranging for the audits
 - If the report was posted to the auditors' publicly accessible Web site
 - Remove the report
 - Post a public notification that the report was removed
 - Determine whether to conduct additional audit work necessary to reissue report with revised findings
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Appendix Supplemental Guidance

Added an appendix to provide supplemental guidance to assist auditors in the implementation of GAGAS

- Does not establish additional GAGAS requirements
 - Overall supplemental guidance includes examples of
 - Deficiencies in internal control
 - Abuse
 - Fraud Risk
 - Overall guidance includes guidance on determining whether laws, regulations, or provisions of contracts are significant
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**Government Auditing Standards:
Proposed Revisions to Standards for
Quality Control and Assurance and
Peer Review**

January 2007 Revision: Implementation Dates

- For performance audits, the standards are to become effective for audits beginning on or after January 1, 2008
- For financial audits and attestation engagements, the standards become effective for audits of periods beginning on or after January 1, 2008
 - Certain standards issued by the AICPA's Auditing Standards Board (ASB) have earlier effective dates. Effective dates of those new ASB standards apply to GAGAS audits
 - Until the 2007 Revision becomes effective, auditors should adopt the terminology and definitions of SAS No. 112 in reporting on internal control
- Early implementation is permissible and encouraged

GAO's Accountability and Standards Team

Yellow Book Team

- Jeanette Franzel (202) 512-9471
- Marcia Buchanan (202) 512-9321
- Gail Vallieres (202) 512-9370
- Michael Hrapsky (202) 512-9535
- Heather Keister (202) 512-2943

We also get lots of help from

- Bob Dacey, GAO Chief Accountant
- Abe Akresh, GAO Senior Expert, Auditing Standards
- Jennifer Allison, Advisory Council Administrator

Contact us at yellowbook@gao.gov

Where to Find the Yellow Book

- The Yellow Book is available on GAO's Web site at

www.gao.gov/govaud/ybk01.htm

- For technical assistance, contact us at

yellowbook@gao.gov