Financial Audit Manual

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GAO U.S. GOVERNMENT ACCOUNTABILITY OFFICE

COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY

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The *Financial Audit Manual* (FAM) presents a methodology for performing financial statement audits of federal entities in accordance with professional standards. It consists of three volumes: FAM volume 1 contains the audit methodology. FAM volume 2 contains detailed implementation guidance. FAM volume 3 contains the Federal Financial Reporting Checklist. Each volume is issued separately.

To ensure that the FAM continues to meet the needs of the federal audit community and the public it serves, the U.S. Government Accountability Office (GAO) and Council of the Inspectors General on Integrity and Efficiency (CIGIE) worked jointly to update FAM volume 2. This revision supersedes the June 2024 revision.[1] It should be used beginning with audits of fiscal year and calendar year 2026 federal entity financial statements. The revisions include new guidance for auditing land and revised guidance related to the Federal Financial Management Improvement Act of 1996, agreed-upon procedures engagements, and oversight of audits performed by independent public accounting firms. Users should consider any other relevant standards and guidance.

GAO and CIGIE distributed a limited exposure draft of this revision to staff from various offices of inspector general and independent public accounting firms that perform federal entity financial statement audits. All comments we received were considered in the final FAM volume 2.

Should you need additional information, please visit https://www.gao.gov/financial_audit_manual or contact us at fam@gao.gov.

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[1]GAO and Council of the Inspectors General on Integrity and Efficiency, *Financial Audit Manual*, vol. 2, GAO-24-107279 (Washington, D.C.: June 2024).

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Summary of Significant Changes

This summary lists significant changes from the June 2024 version of FAM volume 2.

Change description	Section or paragraph reference
Clarified question 19 of FAM 640 A, Service Organization Type 2 Report Assessment Tool, related to the auditor's understanding of the entity's process for assessing and reporting on the effectiveness of internal control.	640 A
Clarified guidance for inspectors general (IG) overseeing financial statement audits performed by independent public accounting (IPA) firms, including clarifying that the IG should perform at least a low level of review when expressing no assurance, or at least a moderate level of review when expressing negative assurance, on an IPA firm's compliance with generally accepted government auditing standards. Revised example transmittal letter for IG oversight of financial statement audits performed by IPA firms.	670, 670 A, 670 B
Revised requirements and guidance for assessing financial management systems' compliance under the Federal Financial Management Improvement Act of 1996 to address recent changes to federal financial management systems requirements and Office of Management and Budget guidance.	701, 701 A
Updated requirements and guidance for performing agreed-upon procedures engagements based on the *U.S. Attestation Standards—AICPA [Clarified]*, sections 105 and 215.	710, 710 A–E
Updated guidance for auditing intragovernmental activity and balances, including guidance related to the federal government's G-Invoicing system and significant entities' use of a standardized balance sheet.	902, 902 A
Added new requirements and guidance related to non-production costs.	903.05, .06, .11
Revised examples of control objectives by assertion related to costs.	903.06
Added guidance for auditing property, plant, and equipment land and updated guidance for auditing stewardship land, in light of the implementation of Statement of Federal Financial Accounting Standards 59, *Accounting and Reporting of Government Land*, and Technical Bulletin 2025-1. Moved guidance on auditing heritage assets from FAM 931 to FAM 932.	931
Created a new section, FAM 932, and moved guidance on auditing heritage assets from FAM 931 to this section. Added reference to Technical Release 9, *Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land*, relating to (1) materiality considerations and (2) identification, categorization, and quantification of heritage assets.	932
Added new requirement for the auditor to obtain additional representations from management if the entity prepares single-year financial statements.	1001.23

Change description	Section or paragraph reference
Clarified that updated legal counsel responses should be on legal counsel letterhead.	1002.33, 1002 B
Revised the financial statement audit completion checklist to incorporate changes made throughout FAM volumes 1 and 2. Added a separate section for steps to be completed before the report release date.	1003

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.01 FAM volume 2 provides detailed guidance and requirements for implementing FAM volume 1. It also provides example audit procedures that are typically used for certain audit areas in conjunction with the related FAM volume 1 sections. The auditor uses professional judgment to tailor the example audit procedures, such as adding procedures, deleting inapplicable procedures, modifying procedures, determining the timing and extent of procedures, and changing the terminology to that used by the entity. The auditor may integrate these example audit procedures with the audit plans for related line items. For example, tests of intragovernmental activity and balances in FAM 902 may be integrated with tests of accounts receivable and payable. To improve efficiency, the auditor may also coordinate these tests with tests of related non-intragovernmental activity and balances.

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SECTION 600

Using the Work of Others

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610 – Overview of Using the Work of Others

.01 In many financial statement audits, the auditor uses the work and reports of other auditors and specialists. Other auditors may include independent public accounting (IPA) firms, inspectors general (IG), state auditors, and internal auditors. Specialists may include statisticians, actuaries, economists, and information technology (IT) professionals.

.02 U.S. Government Accountability Office (GAO) and Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Financial Audit Manual* (FAM) 600 provides guidance to auditors of federal entities on designing and performing oversight and other procedures when using the work of others as follows:

a. evaluating the objectivity and competence of other auditors or specialists (FAM 615),

b. using the work of an auditor's specialist (FAM 620),

c. using the work of management's specialists (FAM 625),

d. audits of group financial statements and using the work of component auditors (FAM 630),

e. entities using the work of a service organization (FAM 640), and

f. using the work of an internal auditor (FAM 645).

In addition, this section addresses IG oversight of financial statement audits performed by IPA firms (FAM 670).

.03 Although FAM 630 provides guidance for using the work of component auditors in an audit of group financial statements, the auditor may find this section, adapted as necessary in the circumstances, useful when using the work of other auditors in auditing financial statements that are not group financial statements. For example, the auditor may involve another auditor to observe the inventory count or inspect physical fixed assets at a remote location. (*US. Auditing Standards—AICPA [Clarified]* (AU-C) 600A.02)

The auditor's responsibilities for supervising other auditors who are essentially functioning as part of the engagement team are the same as those for supervising other engagement team members, as discussed in FAM 200. However, because outside auditors are not subject to a firm's quality control procedures, the auditor should evaluate their objectivity and competence as discussed in FAM 615.

615 – Evaluating the Objectivity and Competence of Other Auditors or Specialists

Overview

.01 FAM 600 discusses circumstances where an auditor may use or review the work of others. Regardless of the purpose for using the work of others, the auditor should evaluate whether the other auditors or specialists have the necessary objectivity and competence for the auditor's purposes. This section provides guidance to assist the auditor in determining the procedures for evaluating the objectivity and competence of other auditors and specialists. There are also specific procedures (as noted in the sections below) that the auditor may need to perform when using or reviewing the work of specialists, component auditors, service auditors, internal auditors, or IPA firms. The chart below links the different FAM 600 sections to the applicable paragraphs of this section.

Relevant FAM 600 section	Objectivity	Competence
FAM 620 – Using the Work of an Auditor's Specialist	FAM 615.03–.07, .35–.36	FAM 615.16–.19, .21, .23–.25, .28, .30–.33, .35–.36
FAM 625 – Using the Work of Management's Specialists	FAM 615.03–.04, .08–.10, .35–.36	FAM 615.16, .23–.25, .28–.29, .35–.36
FAM 630 – Group Audits & Using the Work of a Component Auditor	FAM 615.03–.06, .11, .12, .15, .35–.36	FAM 615.16–.19, .22–.27, .35–.36
FAM 640 – Using the Work of Service Auditors	FAM 615.03–.04, .13, .14, .35–.36	FAM 615.16, .20, .23–.24, .34–.36
FAM 645 – Using the Work of Internal Auditors	FAM 615.03–.04, .15, .35–.36	FAM 615.16, .19, .25–.27, .35–.36
FAM 670 – Oversight of Audits Performed by Contracted IPA Firms	FAM 615.03–.06, .35–.36	FAM 615.16–.18, .23–.27, .35–.36

.02 When using the work of others in situations not specifically addressed above, auditors may find the guidance in this section, adapted as necessary, useful when evaluating the objectivity and competence of others.

Evaluating Other Auditors' or Specialists' Objectivity

.03 Auditors' objectivity in discharging their professional responsibilities is the basis for the credibility of auditing in the government sector. Objectivity includes independence of mind and appearance when conducting engagements, maintaining an attitude of impartiality, having intellectual honesty, and being free of conflicts of interest. Maintaining objectivity includes a continuing assessment of relationships with audited entities and other stakeholders in the context of the auditors' responsibility to the public. The concepts of objectivity and independence are closely related. Independence impairments affect objectivity. (GAGAS (2018) 3.11)

.04 When using or reviewing the work of others, the auditor should evaluate whether other auditors' or specialists' organizations, as well as the individual auditors or specialists, are objective (or independent, as applicable). Component auditors and service auditors should be independent in order for the auditor to use their work. There are also varying degrees of objectivity for evaluating other auditors and specialists. If the auditor has previously evaluated the objectivity of other auditors or specialists for another engagement, the auditor should update the previous evaluation. The nature and extent of evidence needed will depend on the significance of other auditors' or specialists' work to the current audit objectives and the extent to which the auditor will use their work. The following procedures may be used in evaluating the objectivity of other auditors or specialists. In addition, auditors may refer to U.S. generally accepted government auditing standards (GAGAS) as needed when making independence determinations.[1]

.05 If the auditor engages other auditors or specialists as a contractor, the auditor may use a contracting process that is part of its organization or a procurement function within the entity to be audited to evaluate independence and objectivity of other auditors or specialists. For example, the auditor could determine whether the firm selected made the following representations in the proposal: that it and the assigned engagement team

a. are independent and objective with respect to the audited entity,

b. will remain independent throughout the audit,

c. will disclose any independence issues discovered, and

d. will immediately notify the appropriate official(s) (such as the contracting officer's representative (COR)) when considering submitting a proposal on any contracts involving the audited entity to permit evaluation of whether its auditors' independence could be impaired.

Firms may be asked to describe in their proposals all work, including nonaudit services, they have done for the audited entity in the last several years. See GAGAS (2018) 3.64 through 3.106.

The auditor may wish to include in the statement of work (SOW) or request for proposal (RFP) that the government will determine whether a firm is independent for the purpose of performing an audit of financial statements of the entity. This avoids a potential dispute where, for example, the firm does substantial nonaudit work for the entity to be audited that the auditor views as a conflict. The technical evaluation panel may evaluate whether the nature and extent of nonaudit services or other factors cause an independence or objectivity issue, either in independence of mind or independence in appearance.

.06 When the auditor does not participate in contracting for the other auditors or specialists, the auditor may obtain an overview of the contracting process to provide background in evaluating the objectivity of the other auditors or specialists, including

a. reading the SOW or RFP,

[1]See GAGAS (2018) 3.17 through 3.63 for additional discussion related to independence and applying the conceptual framework approach to independence.

b. reviewing the proposal of the firm selected, and

c. understanding the evaluations of the panel that selects the firm.

The auditor may determine whether the other auditors' or specialists' firm provided a representation as to objectivity (usually in its proposal). If the firm has not provided such a representation, the auditor may wish to obtain one from the firm. If the auditor is not familiar with the firm, the auditor can inquire of professional organizations, such as the American Institute of Certified Public Accountants (AICPA) or the Public Company Accounting Oversight Board (PCAOB), about the firm's professional reputation and standing. The auditor may also consider whether the other auditors' or specialists' work is subject to technical performance standards or other professional or industry requirements (for example, specialists may be subject to ethical standards and other membership requirements of a professional body or industry association, accreditation standards of a licensing body, or requirements imposed by law or regulation (AU-C 620.A17)).

Additional Procedures to Perform in Evaluating Objectivity for Specific Types of Specialists and Auditors

Internal Specialists

.07 An auditor's internal specialist may be a partner or staff member, including temporary staff member, of the auditor's organization and therefore subject to the independence and/or objectivity quality control policies and procedures of that organization (AU-C 620.A12). In accordance with AU-C 220A, *Quality Control for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards*, the auditor is entitled to rely on the organization's system of quality control unless the auditor's engagement partner determines that it is inappropriate to do so based on information provided by the other auditors' or specialists' firms or other parties. However, such reliance does not reduce the auditor's responsibility to meet the requirements of AU-C 620, *Using the Work of an Auditor's Specialist* (AU-C 620.A13).

Management's Specialists

.08 Based on AU-C 501.A73, when evaluating the objectivity of management's specialists, the auditor may consider any controls within the entity over their work as important factors with regard to the reliability of any information they produce. A broad range of circumstances may threaten objectivity, for example, self-interest threats, advocacy threats, familiarity threats, self-review threats, and intimidation threats (AU-C 501.A77).

.09 Although safeguards cannot eliminate all threats to the objectivity of management's specialists, threats such as intimidation threats may be of less significance to a specialist engaged by the entity than to a specialist employed by the entity, and the effectiveness of safeguards such as quality control policies and procedures may be greater. Because the threat to objectivity created by being an employee of the entity will always be present, a specialist employed by the entity cannot ordinarily be regarded as being more likely to be objective than other employees of the entity (AU-C 501.A78).

.10 When evaluating the objectivity of a specialist engaged by the entity, it may be relevant to discuss with management and that specialist any interests and

relationships that may create threats to the specialist's objectivity and any applicable safeguards, including any professional requirements that apply to the specialist, and to evaluate whether the safeguards are adequate. Relevant information may be obtained by performing the procedures described in FAM 220, 265, 280, 550, and 904 pertaining to related parties. Interests and relationships creating threats may include

a. financial interests,

b. business and personal relationships between the entity and the individual specialist and between the entity and the organization that employs the individual specialist, and

c. provision of other services (AU-C 501.A79).

Component Auditors of a Group Audit

.11 In addition to evaluating whether a **component auditor** is independent and objective, the auditor (group engagement team) should obtain an understanding of whether a component auditor understands and will comply with the ethical requirements that are relevant to the group audit (AU-C 600A.22 and see FAM 630). Such requirements may be different from or in addition to those applying to a component auditor when performing an audit in the component auditor's jurisdiction. The auditor, therefore, obtains an understanding about the component auditor's understanding of, and compliance with, the ethical requirements that are relevant to the group audit and whether these are sufficient to fulfill the component auditor's responsibilities in the group audit. When the component auditor is not subject to the AICPA Code of Professional Conduct, the component auditor's compliance with the ethics and independence requirements set forth in the International Federation of Accountants Code of Ethics for Professional Accountants is sufficient to fulfill the component auditor's ethical responsibilities in the group audit (AU-C 600A.A46).

.12 The auditor should obtain written representations from the component auditor that to the best of their knowledge, the firm and the individual auditors doing the work have complied with ethical requirements relevant to the group audit, including independence (AU-C 600A.42).

Service Auditors

.13 When the auditor is using a type 1 or type 2 report prepared by a service auditor, the auditor should be satisfied regarding the service auditor's independence from the service organization (see FAM 640.07). However, a service auditor need not be independent of the entity (AU-C 402.A22).

.14 Unless evidence to the contrary comes to the auditor's attention, a service auditor's report implies that the service auditor is independent of the service organization (AU-C 402.A22). The service auditor is required to include "independent" in the title of the report (AICPA's *Standards for Attestation Engagements [Clarified]* (AT-C) 320.40–.41). If the auditor has questions or concerns about the service auditor's independence, the auditor should work with the entity under audit to assess the service auditor's independence from the service organization using chapter 3 of GAGAS (2018) and FAM 615.03 through .06.

Government Auditors

.15 When using the work of government auditors, the auditor should also consider the guidance in GAGAS (2018) 3.52 through 3.58 in determining independence and objectivity.

Evaluating Other Auditors' or Specialists' Competence

Overview

.16 After evaluating the other auditors' or specialists' objectivity (and independence, as appropriate), the auditor should evaluate their competence to perform the specific tasks required (AU-C 402.13, AU-C 501.27, AU-C 600A.22, AU-C 610.13, and AU-C 620.09). This involves evaluating the competence of the other auditors' or specialists' firms as well as that of specific team members. Where the auditor has previously used the work of the same other auditors or specialists, the auditor generally should update the previous evaluation.

Evaluating Other Auditors' or Specialists' Competence at the Organization/Firm Level

.17 If the auditor engages the other auditors or specialists as a contractor, the auditor generally should evaluate the other auditors' or specialists' firms' qualifications through the contracting process, usually by using a technical evaluation panel for selecting a qualified firm. A firm may submit résumés for its key team members, demonstrate why its team is qualified to do the work, and submit its plan for performing the work.

The auditor should request a copy of the other auditors' firms' most recent peer review report (GAGAS (2018) 5.80). The auditor should also request that the firm provide any updated peer review reports during the period of the contract. The auditor may request that the other auditors' firms provide a copy of their latest public inspection report prepared by the PCAOB, if applicable.[2] While these reports pertain to audits of publicly traded companies and related quality controls, to the extent that they raise issues about the firm's quality controls or methodology, they may be relevant to audits of federal entities.

.18 Where the auditor did not participate in the contracting process for the other auditors or specialists, the auditor should determine how the qualifications of a firm were evaluated. For example, consider whether the technical evaluation panel or entity under audit review provided the following:

a. résumés of the key team members,

b. the audit approach,

c. the peer review report and related letter of comments (if any), and

d. the firm's response to the peer review report.

The auditor should read the reviewed documents and conclude on competence.

[2]Further information on the PCAOB inspection report process is available at https://pcaobus.org (accessed May 29, 2026).

.19 **For government internal or external auditors**, the auditor should ask whether the audit organization had a peer review and the date of that review. To comply with GAGAS, the audit organization should have a peer review performed by reviewers independent of the audit organization every 3 years (GAGAS (2018) 5.84).

The auditor should read the peer review report, the letter of comments, and the audit organization's response.

.20 If using the work of a **service auditor**, the auditor should request from the entity under audit the service auditor's most recent peer review report and any other written communication issued. The auditor should evaluate the reports and work with the entity under audit if any additional information is needed to evaluate the competency of the service auditor's firm.

.21 If the auditor is using an **internal specialist** (which may be a partner or staff member, including a temporary staff member, of the auditor's organization), the internal specialist would be subject to the competence quality control policies and procedures of that organization (AU-C 620.A12). In accordance with AU-C 220A, auditors are entitled to rely on the organization's system of quality control unless the auditor's engagement partner determines that it is inappropriate to do so based on information provided by firms or other parties.

.22 For group audits, the auditor should obtain written representations from the **component auditor** that to the best of their knowledge the component auditor has complied with ethical requirements relevant to the group audit, including professional competence (AU-C 600A.42).

Evaluation of Peer Review Reports

.23 Where the auditors' or specialists' firm has received a peer review rating of pass within the last 3 years, the auditor generally need not perform further review of the firm's quality controls. However, the auditor may request and review letter of comments, if any, relating to the peer review.

.24 Where the other auditors' or specialists' firm receives a peer review or inspection report rating of pass with deficiencies or fail, the auditor should evaluate whether the quality control system has since been strengthened to allow the auditor to use the other auditors' or specialists' work. The auditor may review the firm's action plan for improving quality controls and inspection results in determining whether quality controls have improved since the peer review. The auditor should evaluate the effect of remaining weaknesses in determining the nature and extent of procedures to be performed.

Evaluating Other Auditors' or Specialists' Competence at the Individual Team Member Level

.25 In addition to evaluating the other auditors' or firms' competence, the auditor also should evaluate the overall competence of the key individual team members assigned to do the work. The auditor may review résumés and training records of key team members to accomplish this. The auditor should review the specific education, training, certifications, and experience of key team members. In evaluating qualifications, the auditor should review the specific role of team members on the job. When the auditor has knowledge of competence from prior

experience for key team members, the auditor should inquire about their experience since the last audit.

Other Auditors (Except Service Auditors)

.26 The auditor should determine that other auditors engaged to assist in performing financial audits, who do not work for a government audit organization, are licensed certified public accountants, persons working for licensed certified public accounting firms, or licensed accountants in states that have multiclass licensing systems that recognize licensed accountants other than certified public accountants (GAGAS (2018) 6.04).[3] The auditor should also determine whether the other auditors are competent as required by GAGAS, including having completed continuing professional education (CPE) requirements. See chapter 4 of GAGAS (2018) (Competence and Continuing Professional Education). This may include obtaining an assertion, reviewing years of experience, reviewing types of past audits performed, and reviewing CPE history.

.27 The auditor's understanding of the other auditors' professional competence may include whether the other auditors (AU-C 600A.A48)

a. possess an understanding of the auditing and other standards applicable to the audit, such as U.S. generally accepted auditing standards (U.S. GAAS), that is sufficient to fulfill the other auditors' responsibilities;

b. possess the special skills (for example, industry-specific knowledge or knowledge of relevant financial reporting requirements for statements and schedules to be filed with regulatory agencies) necessary to perform the work; and

c. when relevant, possess an understanding of the applicable financial reporting framework (generally U.S. GAAP) that is sufficient to fulfill the other auditors' responsibilities in the audit (instructions that the auditor issues to the other auditors often describe the characteristics of the applicable financial reporting framework).[4]

Specialists

.28 Sources that may inform the auditor's assessment of the competence and professional qualifications of a specialist include the following (GAGAS (2018) 4.15):

a. the professional certification, license, or other recognition of the competence of the specialist in the specialist's field, as appropriate;

b. the reputation and standing of the specialist in the views of peers and others familiar with the specialist's capability or performance;

c. the specialist's experience and previous work in the subject matter;

d. the auditor's assessment of the specialist's knowledge and qualification based on prior experience in using the specialist's work;

[3]See GAGAS (2018) 6.05 for licensing requirements for auditors who are engaged to conduct financial audits of entities operating outside the United States.

[4]For federal entities, the applicable financial reporting framework is generally U.S. GAAP. See FAM 110.02.

e. the specialist's knowledge of any technical performance standards or other professional or industry requirements in the specialist's field (for example, ethical standards and other membership requirements of a professional body or industry association, accreditation standards of a licensing body, or requirements imposed by law or regulation);

f. the knowledge of the specialist with respect to relevant auditing standards; and

g. the assessment of unexpected events, changes in conditions, or the evidence obtained from the results of engagement procedures that indicate it may be necessary to reconsider the initial evaluation of the competence and qualifications of a specialist as the engagement progresses.

.29 When using the work of **management's specialists**, the auditor may consider their competence with respect to relevant accounting requirements, for example, knowledge of assumptions and methods, including models, when applicable, that are consistent with the applicable financial reporting framework (generally U.S. GAAP) (AU-C 501.A76). Refer to AU-C 501.A73 through .A76 for additional guidance specific to management's specialists.

.30 The auditor should determine that **external specialists** (specialists who are hired/engaged from outside the auditor's organization) assisting in performing a GAGAS engagement are qualified and competent in their areas of specialization (GAGAS (2018) 4.12). However, external specialists are not auditors subject to the GAGAS CPE requirements (GAGAS (2018) 4.30). Auditors who use the work of external specialists should assess the professional qualifications of such specialists and document their findings and conclusions.

.31 The auditor should determine that **internal specialists** (specialists who are from within the auditor's organization) assisting on a GAGAS engagement who are not involved in planning, directing, performing engagement procedures, or reporting on a GAGAS engagement, are qualified and competent in their areas of specialization (GAGAS (2018) 4.12). However, these internal specialists are not auditors subject to the GAGAS CPE requirements (GAGAS (2018) 4.30).

.32 The auditor should determine that **internal specialists**, who are performing work in accordance with GAGAS as part of the engagement team—including planning, directing, performing engagement procedures, or reporting on a GAGAS engagement—are considered auditors and are subject to the GAGAS CPE requirements (see GAGAS (2018) 4.16–4.53). The GAGAS CPE requirements become effective for internal specialists when an audit organization first assigns an internal specialist to an engagement. Because internal specialists apply specialized knowledge in government engagements, CPE in their areas of specialization qualifies under the requirement for 24 hours of CPE that directly relates to government auditing, the government environment, or the specific or unique environment in which the audited entity operates (GAGAS (2018) 4.31).

.33 An auditor's **internal specialist** may be a partner or staff member, including a temporary staff member, of the auditor's organization and therefore subject to the competence quality control policies and procedures of that firm. (AU-C 620.A12) In accordance with AU-C 220A, auditors are entitled to rely on the organization's system of quality control unless the auditor's engagement partner determines that it is inappropriate to do so based on information provided by the organization or other parties. However, such reliance does not reduce the auditor's

responsibility to meet the requirements of this FAM section and AU-C 620 (AU-C 620.A13).

Service Auditors

.34 The auditor is not required to assess the competence of the individual team members working on a service organization audit. If the auditor is satisfied with the service auditor firm's competence (see FAM 615.20), then no further procedures are necessary. However, if the auditor is not satisfied with the service auditor firm's competence, the auditor may make inquiries to the entity under audit regarding the service organization's individual team members' competence (see FAM 615.25).

Documentation

.35 The auditor should document the work performed and the conclusions reached as to the other auditors' or specialists' firm's independence, objectivity, and qualifications, as well as that of the individual team members of the other auditors' or specialists' firms. The auditor should also document whether the other auditors' or specialists' individual team members have any significant threats to independence and whether necessary safeguards were applied to eliminate those threats or reduce to an acceptable level. See GAGAS (2018) 3.32 for additional information. The documentation should indicate the auditor's conclusion as to whether the other auditors or specialists are independent, objective, and qualified to perform the tasks required and the basis for that conclusion. If the auditor has questions or concerns about the other auditors' or specialists' independence, objectivity, or qualifications, the auditor must provide the related documentation to the reviewer in a timely manner to allow any issues to be promptly identified and resolved.[5]

.36 If the auditor has significant concerns about the other auditors' or specialists' independence, objectivity, or qualifications, the auditor should revise its audit strategy. For example, the auditor may

a. perform a more detailed review of the documentation,

b. perform supplemental tests for material line items, accounts, note disclosures, or classes of transactions;

c. contract with another firm;

d. ask the other auditors to substitute more highly qualified or objective staff members;

e. perform the audit without using the other auditors' work, treating any work done by the other auditors as prepared by the audited entity;

f. divide the work so that the other auditors test the areas where they are qualified and the auditor does the rest of the audit; or

[5]There are a few circumstances identified in the FAM where timely review of audit documentation by the reviewer at appropriate stages during the engagement is required to ensure the effectiveness and efficiency of the audit. Generally, timely manner in this context means after the engagement team makes a judgment or conclusion about an issue and before the judgment or conclusion is implemented or finalized.

g. if the auditor is unable to resolve the concerns, determine the effect on the audit opinion (e.g., if there is a scope limitation requiring a modification to the audit opinion).

620 – Using the Work of an Auditor's Specialist

Overview

.01 This section provides guidance on the auditor's responsibilities relating to the work of an individual or organization possessing expertise in a field other than accounting or auditing when that work is used to assist the auditor in obtaining sufficient appropriate audit evidence (AU-C 620.01).

.02 This section does not address situations in which the engagement team includes a member or consults an individual or organization with expertise in a specialized area of accounting or auditing, which are addressed in FAM 210.08 and AU-C 220A (AU-C 620.02a).

.03 This section also does not address the auditor's use of the work of an individual or organization possessing expertise in a field other than accounting or auditing, whose work in that field the entity to be audited uses to assist it in preparing the financial statements (management's specialists), which is addressed in FAM 625 (AU-C 620.02b).

.04 Based on AU-C 620.A1 and 300.A20, expertise in a field other than accounting or auditing may include expertise regarding such matters as the following:

a. the valuation of complex financial instruments and nonfinancial assets and liabilities measured at fair value, such as land and buildings, plant and machinery, jewelry, works of art, antiques, intangible assets, assets acquired and liabilities assumed in business combinations, and assets that may have been impaired;

b. the actuarial calculation of liabilities associated with insurance contracts or employee benefit plans;

c. the estimation of oil and other mineral reserves;

d. the valuation of environmental liabilities and site cleanup costs;

e. the interpretation of laws, regulations, contracts, and grant agreements;

f. the analysis of complex or unusual tax compliance issues;

g. the determination of physical characteristics relating to quantity on hand or condition (for example, quantity or condition of minerals or materials stored in stockpiles);

h. the analysis of the effect of information technology on the audit and the understanding and evaluation of information system controls (IS controls); and

i. statistical analysis.

.05 The following are examples of positions that generally should be considered auditor's specialists:

a. statistician (with audit sampling experience),

b. audit sampling specialist,

c. legal counsel,

d. IT specialist,[6]

e. actuary (for insurance and pension audits),

f. economist,

g. financial analyst, and

h. environmental specialist.

.06 In many cases, distinguishing between expertise in accounting or auditing and expertise in another field will be straightforward, even when this involves a specialized area of accounting or auditing. The table below highlights some examples (AU-C 620.A2).

Area	**Expertise in accounting and auditing** (Auditor)	**Expertise in a field <u>other</u> than accounting and auditing** (Auditor's specialist)
Employee benefits	Applying methods of accounting for employee benefit accrual	Actuarial computation of employee benefits
Financial instruments	Applying methods of accounting for financial instruments	Complex modeling for the purpose of valuing financial instruments

.07 However, in some cases, particularly those involving an emerging area of accounting or auditing expertise, distinguishing between specialized areas of accounting or auditing and expertise in another field will be a matter of professional judgment. Applicable professional rules and standards regarding education and competency requirements for accountants and auditors may assist the auditor in exercising that judgment (AU-C 620.A2).

.08 An individual may possess expertise in accounting or auditing, as well as expertise in a field other than accounting or auditing (for example, an actuary also may be an accountant). In that circumstance, determining whether that individual is an auditor or an auditor's specialist depends on the nature of the work that individual performs that the auditor is using for purposes of the audit (AU-C 620.A3).

.09 An auditor's specialist may be either an auditor's internal specialist (who is a partner or staff member, including a temporary staff member, of the auditor's organization) or an auditor's external specialist (AU-C 620.06).

Determining the Need for an Auditor's Specialist

.10 If expertise in a field other than accounting or auditing is necessary to obtain sufficient appropriate audit evidence, the auditor should determine whether to use the work of an auditor's specialist (AU-C 620.07). As the audit progresses or

[6]An IT specialist differs from an IS controls auditor. An IT specialist possesses special skills or knowledge in an IT field that extend beyond the skills and knowledge normally possessed by those working in specialized fields of auditing, such as IS controls auditing. Auditors and IS controls auditors may decide to seek the assistance of an IT specialist to complete various aspects of the engagement.

as circumstances change, the auditor may need to revise earlier decisions about using the work of an auditor's specialist (AU-C 620.A7).

.11 An auditor's specialist may be needed to assist the auditor in one or more of the following (AU-C 620.A5):

a. obtaining an understanding of the entity and its environment, the applicable financial reporting framework (generally U.S. GAAP), and the entity's internal control;

b. identifying and assessing the risks of material misstatement;

c. determining and implementing overall responses to assessed risks at the financial statement level;

d. designing and performing additional audit procedures to respond to the risks of material misstatement at the assertion level, which may include tests of controls or substantive procedures; and

e. evaluating the sufficiency and appropriateness of audit evidence obtained in forming an opinion on the financial statements.

.12 In some situations, the auditor may determine that it is necessary to use, or may choose to use, an auditor's specialist to assist in obtaining sufficient appropriate audit evidence. Considerations when deciding whether to use an auditor's specialist may include the following (AU-C 620.A9):

a. whether management has used a specialist in preparing the financial statements (see AU-C 620.A10);

b. the nature and significance of the matter, including its complexity;

c. the risks of material misstatement of the matter; and

d. the expected nature of procedures to respond to identified risks, including the auditor's knowledge of, and experience with, the work of specialists on such matters and the availability of alternative sources of audit evidence.

.13 An auditor's specialist may also be needed to assist the auditor and the IS controls auditor in understanding technical aspects of information systems and IS controls. In determining whether such a specialist is needed on the audit, the auditor may consider such factors as the following (AU-C 300.A20):

a. the complexity of the entity's systems and IS controls and the manner in which they are used in conducting the entity's business;

b. the significance of changes made to existing systems or the implementation of new systems;

c. the extent to which data are shared among systems;

d. the extent of the entity's participation in electronic commerce;

e. the entity's use of emerging technologies; and

f. the significance of audit evidence that is available only in electronic form.

.14 In other cases, however, an auditor who is not a specialist in a relevant field other than accounting or auditing may be able to obtain a sufficient understanding of that field to perform the audit without an auditor's specialist. This understanding may be obtained through the following, for example (AU-C 620.A8):

a. Experience in auditing entities that require such expertise in preparing their financial statements.

b. Education or professional development in the particular field. This may include formal courses or discussion with individuals possessing expertise in the relevant field to enhance the auditor's own capacity to deal with matters in that field. Such discussion differs from consultation with an auditor's specialist regarding a specific set of circumstances encountered on the engagement in which that specialist is given all the relevant facts that will enable the specialist to provide informed advice about the particular matter.

Planning the Review of the Work of an Auditor's Specialist

.15 The nature, timing, and extent of the auditor's procedures with respect to the requirements in FAM 620.18, .19, .21, .27, and .29 will vary depending on the circumstances. In determining the nature, timing, and extent of those procedures, the auditor should consider matters including (AU-C 620.08)

a. the nature of the matter to which the work of the auditor's specialist relates;

b. the risks of material misstatement in the matter to which the work of the auditor's specialist relates;

c. the significance of the work of the auditor's specialist in the context of the audit;

d. the auditor's knowledge of, and experience with, previous work that the auditor's specialist performed; and

e. whether the auditor's internal specialist is subject to the auditor's organization's quality control policies and procedures.

.16 For internal specialists (i.e., partners or staff members, including temporary staff members, within the auditor's organization), in accordance with AU-C 220A.05, auditors are entitled to rely on the auditor's organization's system of quality control unless the auditor's engagement partner determines that it is inappropriate to do so based on information provided by the auditor's organization or other parties. The extent of that reliance will vary based on the circumstances and may affect the nature, timing, and extent of the auditor's procedures with respect to such matters as the following (AU-C 620.A13):

a. Competence and capabilities through recruitment and training programs.

b. Independence and objectivity. The auditor's internal specialists are subject to relevant ethical requirements, including those pertaining to independence.

c. Agreement with the auditor's internal specialist.

d. The auditor's evaluation of the adequacy of the auditor's internal specialist's work. For example, the auditor's organization's training programs may provide the auditor's internal specialists with an appropriate understanding of the interrelationship of their expertise with the audit process. Reliance on such training and other organization processes, such as protocols for scoping the work of the auditor's internal specialists, may affect the nature, timing, and extent of the auditor's procedures for evaluating the adequacy the auditor's internal specialist's work.

e. Adherence to legal and regulatory requirements through monitoring processes.

Such reliance does not reduce the auditor's responsibility to meet the requirements of this section (AU-C 620.A13).

.17 It is necessary to apply professional judgment when considering how the requirements of this section are affected by the fact that an auditor's specialist may be either an individual or an organization. For example, when evaluating the independence, objectivity, competence, and capabilities of an auditor's specialist, it may be that the specialist is an organization that the auditor has previously used, but the auditor has no prior experience with the individual specialist assigned by the organization for the particular engagement, or it may be the reverse (that is, the auditor may be familiar with the work of an individual specialist but not with the organization that now employs the specialist). In either case, both the personal attributes of the individual and the managerial attributes of the organization (such as systems of quality control that the organization implements) may be relevant to the auditor's evaluation (AU-C 620.A4).

Evaluating the Objectivity, Competence, and Capabilities of the Auditor's Specialist

.18 The auditor should evaluate whether the auditor's specialist has the necessary objectivity, competence, and capabilities for the auditor's purposes. In the case of an auditor's external specialist, the evaluation of objectivity should include inquiry regarding interests and relationships that may create a threat to the objectivity of the auditor's specialist. (AU-C 620.09) See FAM 615 and AU-C 620.A15 through .A22 for additional guidance.

Obtaining an Understanding of the Field of Expertise of the Auditor's Specialist

.19 The auditor should obtain a sufficient understanding of the field of expertise of the auditor's specialist to enable the auditor to determine the nature, scope, and objectives of the specialist's work for the auditor's purposes and evaluate the adequacy of that work for the auditor's purposes (AU-C 620.10).

.20 Aspects of the field of the auditor's specialist relevant to the auditor's understanding may include the following (AU-C 620.A24):

a. whether the field of the auditor's specialist has areas of specialty within it that are relevant to the audit;

b. whether any professional or other standards and legal or regulatory requirements apply;

c. what assumptions and methods, including models, when applicable, the auditor's specialist uses, and whether they are generally accepted within that field and appropriate for financial reporting purposes; and

d. the nature of internal and external data or information that the auditor's specialist uses.

Agreement with the Auditor's Specialist

.21 The auditor should agree, in writing when appropriate, with the auditor's specialists regarding (AU-C 620.11)

a. the nature, scope, and objectives of the work of the auditor's specialist;

b. the respective roles and responsibilities of the auditor and the auditor's specialist;

c. the nature, timing, and extent of communication between the auditor and the auditor's specialist, including the form of any report that the specialist is to provide; and

d. the need for the auditor's specialist to observe confidentiality requirements.

AU-C 620.A25 through .A34 provide additional guidance on this agreement, some of which is discussed below.

.22 The matters noted in FAM 620.15 may affect the level of detail and formality of the agreement between the auditor and the auditor's specialist, including whether it is appropriate that the agreement be in writing. For example, the following factors may suggest the need for a more detailed agreement than would otherwise be the case or for the agreement to be in writing (AU-C 620.A26):

a. the auditor's specialist will have access to sensitive or confidential entity information;

b. the respective roles or responsibilities of the auditor and the auditor's specialist are different from those normally expected;

c. multijurisdictional legal or regulatory requirements apply;

d. the matter to which the work of the auditor's specialist relates is highly complex;

e. the auditor has not previously used work performed by the auditor's specialist; and

f. the auditor's use of the work of the auditor's specialist is extensive and is significant in the context of the audit.

.23 In establishing the agreement with the auditor's specialist, an important consideration is whether the work of the auditor's specialist is subject to any reservation, limitation, or restriction and whether this has implications for the auditor (AU-C 620.A27).

.24 When no written agreement exists between the auditor and the auditor's specialist, evidence of the agreement may be included in the following, for example (AU-C 620.A29):

a. Planning memorandums or related working papers, such as the audit plan.

b. The policies and procedures of the auditor's firm. In the case of an auditor's internal specialist, the established policies and procedures to which the auditor's specialist is subject may include particular policies and procedures regarding the work of the auditor's specialist. The extent of documentation in the auditor's working papers depends on the nature of such policies and procedures. For example, no documentation may be required in the auditor's

working papers if the auditor's organization has detailed protocols covering the circumstances in which the work of such an internal specialist is used.

Evaluating the Adequacy of the Work of an Auditor's Specialist

.25 The following affect the nature, timing, and extent of audit procedures for evaluating the adequacy of the work of an auditor's specialist for the auditor's purposes (AU-C 620.A35):

a. the auditor's evaluation of the objectivity, competence, and capabilities of the specialist;

b. the auditor's familiarity with the specialist's field of expertise;

c. the risk of material misstatement in the matter to which the specialist's work relates;

d. the nature of the work performed by the specialist; and

e. the significance of the specialist's work in the context of the audit.

.26 The level of review is based on the auditor's professional judgment considering the following factors along with matters identified in FAM 620.15:

a. The **specialist's objectivity.** The level of auditor review increases as specialist's objectivity decreases.

b. The **specialist's qualifications** (both for the specialist's firm and its engagement team) to perform the work the auditor wishes to use. The level of auditor review increases as the specialist's qualifications decrease.

c. The **auditor's prior experience** with the specialist. The level of auditor review tends to decrease as the auditor's confidence increases from working with the specialist.

d. The **materiality of the line item** in relation to the financial statements as a whole. The level of auditor review increases as the line item value increases.

e. The **risk of material misstatement**, including the risk of material fraud for the line item and assertion in the financial statements on which the specialist is performing procedures. The level of auditor review increases as the risk of material misstatement increases.

f. The specialist is an **internal specialist**. The level of review decreases if the work the auditor wishes to use is subject to the auditor's quality control policies and procedures.

The auditor may need to reevaluate the planned level of review as the work progresses. If serving as the COR, the auditor will assist the contracting officer to ensure contractor compliance with the terms and conditions of the contract.

.27 It is not necessary to perform supplemental tests of the work of specialists. As indicated in AU-C 620.12, the auditor should evaluate the adequacy of the work of an auditor's specialist for the auditor's purposes, including

a. evaluating the relevance and reasonableness of the specialist's findings and conclusions and consistency with other audit evidence (see FAM 620.30);

b. obtaining an understanding of the significant assumptions and methods that the specialist used and evaluating the relevance and reasonableness of

those assumptions and methods in the circumstances, giving consideration to the rationale and support provided by the specialist and in relation to the auditor's other findings and conclusions (see FAM 620.31 through .33); and

c. evaluating the relevance, completeness, and accuracy of source data that are significant to the work of the auditor's specialist (extent of testing is based on risk and materiality) (see FAM 620.34 through .35).

.28 Specific procedures to evaluate the adequacy of the work of the auditor's specialist for the auditor's purposes may include the following (AU-C 620.A36):

a. Making inquiries of the auditor's specialist.

b. Reviewing the working papers and reports of the auditor's specialist.

c. Performing corroborative procedures, such as

- observing the work of the auditor's specialist,
- examining published data, such as statistical reports from reputable, authoritative sources,
- confirming relevant matters with third parties,
- performing detailed analytical procedures, and
- reperforming calculations.

d. Engaging in discussion with another specialist with relevant expertise when, for example, the findings or conclusions of the auditor's specialist are not consistent with other audit evidence.

e. Discussing the report of the auditor's specialist with management.

.29 If the auditor determines that the work of the auditor's specialist is not adequate for the auditor's purposes, the auditor should (1) agree with the auditor's specialist on the nature and extent of further work that the specialist is to perform or (2) perform additional audit procedures appropriate to the circumstances (AU-C 620.13). Additional audit procedures may involve additional work being performed by both the auditor's specialist and the auditor or include employing or engaging another specialist (AU-C 620.A44). See AU-C 620.A43 for examples of situations in which the auditor may conclude that the work of the auditor's specialist is not adequate for the auditor's purposes.

Evaluating Findings and Conclusions

.30 Relevant factors when evaluating the relevance and reasonableness of the findings or conclusions of the auditor's specialist, whether in a report or other form, may include whether they are (AU-C 620.A37)

a. presented in a manner that is consistent with any standards of the auditor's specialist's profession or industry;

b. clearly expressed, including reference to the objectives agreed on with the auditor, the scope of the work performed, and standards applied;

c. based on an appropriate period and take into account subsequent events, when relevant; and

d. based on appropriate consideration of errors or deviations that the auditor's specialist encountered.

Evaluating Significant Assumptions and Methods

.31 When the work of an auditor's specialist involves using significant assumptions and methods, the appropriateness and reasonableness of those assumptions and methods used and their application are the responsibility of the auditor's specialist. The auditor is responsible for obtaining an understanding of those assumptions and methods and evaluating the relevance and reasonableness of those assumptions and methods in the circumstances. Factors relevant to the auditor's evaluation of those assumptions and methods include whether they are

a. generally accepted within the specialist's field;

b. consistent with the requirements of the applicable financial reporting framework (generally U.S. GAAP);

c. dependent on the use of specialized models (see FAM 905); and

d. consistent with those of management—if not consistent, the reason for, and effects of, the differences should be provided. (AU-C 620.A40)

.32 When the purpose of the auditor's specialist's work is to evaluate underlying assumptions and methods, including models, when applicable, that management uses in developing an accounting estimate, the auditor's procedures are likely to be primarily directed to evaluating whether the auditor's specialist has adequately reviewed those assumptions and methods. When the purpose of the auditor's specialist's work is to develop an auditor's point estimate or an auditor's range for comparison with management's point estimate, the auditor's procedures may be primarily directed to evaluating the assumptions and methods, including models, when appropriate, used by the specialist. (AU-C 620.A38)

.33 FAM 905 discusses the assumptions and methods that management uses in making accounting estimates, including the use, in some cases, of highly specialized, entity-developed models. Although that discussion is written in the context of the auditor obtaining sufficient appropriate audit evidence regarding management's assumptions and methods, it also may assist the auditor when evaluating the assumptions and methods of an auditor's specialist (AU-C 620.A39).

Evaluating Source Data

.34 As discussed in FAM 410.02, the auditor should evaluate the relevance and reliability of information to be used as audit evidence, including its source. When the work of an auditor's specialist involves the use of source data that are significant to the work of the auditor's specialist, the auditor may perform procedures such as the following to test such data (AU-C 620.A41):

a. verifying the origin of the data, including obtaining an understanding of and, when applicable, testing the internal controls over the data and, when relevant, their transmission to the auditor's specialist, and

b. reviewing the data for completeness and internal consistency.

.35 In many cases, the auditor may test source data. However, in other cases, when the nature of the source data used by an auditor's specialist is highly technical in relation to the field of the auditor's specialist, that auditor's specialist may test the source data. If the auditor's specialist has tested the source data, it may be appropriate for the auditor to conduct inquiry of the auditor's specialist or to

supervise or review the specialist's test to evaluate the data's relevance, completeness, and accuracy (AU-C 620.A42).

Reference to the Auditor's Specialist in the Auditor's Report

.36 The auditor has sole responsibility for the audit opinion expressed, and that responsibility is not reduced by the auditor's use of the work of an auditor's specialist. Nonetheless, if the auditor using an auditor's specialist's work, having followed this section, concludes that the work of that specialist is adequate for the auditor's purposes, the auditor may accept that specialist's findings or conclusions in the specialist's field as appropriate audit evidence (AU-C 620.03).

.37 If the auditor concludes that the work of the auditor's specialist is not adequate for the auditor's purposes and the auditor cannot resolve the matter through the additional audit procedures discussed in FAM 620.29, it may be necessary to express a modified opinion in the auditor's report, as discussed in FAM 580 (AU-C 620.A44).

.38 The auditor should not refer to the work of an auditor's specialist in an auditor's report containing an unmodified opinion (AU-C 620.14). In this situation, the auditor issues the example report in FAM 595 A (as if no specialist were involved). This means that the auditor takes responsibility for the specialist's work. Professional standards do not permit referring to a specialist unless the auditor issues a qualified or adverse opinion or a disclaimer of opinion based on the specialist's work.

.39 If the auditor makes reference to the work of an auditor's external specialist in the auditor's report because such reference is relevant to an understanding of a modification to the auditor's opinion, the auditor should indicate in the auditor's report that such reference does not reduce the auditor's responsibility for that opinion (AU-C 620.15). In such circumstances, the auditor may need the specialist's permission before making such a reference (AU-C 620.A46).

Documentation

.40 In the overall audit strategy, the auditor should include or refer to other documentation where this information is described in more detail on the following areas:

a. Determination of whether to use the work of an auditor's specialist (AU-C 620.07).

b. Matters considered when determining the nature, timing, and extent of the auditor's procedures with respect to the requirements of this section (AU-C 620.08).

c. Evaluation of whether the specialist has the necessary independence, objectivity, competence, and capabilities for the auditor's purposes (AU-C 620.09). This evaluation may be limited if the individual or organization is subject to the auditor's organization's quality control procedures or to formal contracts.

d. Understanding of the auditor's specialist's field of expertise, enabling the auditor to determine the nature, scope, and objectives of the auditor's specialist's work for the auditor's purposes and to evaluate the adequacy of that work for the auditor's purposes (AU-C 620.10).

.41 The auditor should document the understanding of the agreement between the auditor and the specialist (AU-C 620.11). This documentation may consist of planning memorandums, audit plans, policies and procedures of the auditor's organization, or formal contracts when appropriate.

.42 The auditor should document evaluation of the adequacy of the auditor's specialist's work in the audit summary memorandum, including the auditor's conclusions on the (1) relevance and reasonableness of the auditor's specialist's findings and conclusions and consistency with other audit evidence; (2) relevance and reasonableness of any significant assumptions and methods the specialist used; and (3) the relevance, completeness, and accuracy of any source data that are significant to the auditor's specialist's work (AU-C 620.12). In the memorandum, the auditor may refer to other documentation where this information is described in more detail.

625 – Using the Work of Management's Specialists

Overview

.01 This section provides guidance on the auditor's responsibilities related to using the work of management's specialists. Management's specialists are individuals or organizations possessing expertise in a field other than accounting or auditing, whose work in that field is used by the entity to assist it in preparing its financial statements (AU-C 501.04).

.02 See FAM 620.04 through .05 for examples of specialists that management might use.

Planning the Review of the Work of Management's Specialists

.03 If information to be used as audit evidence has been prepared using the work of management's specialists, the auditor should, to the extent necessary, taking into account the significance of those specialists' work for the auditor's purposes, perform the following (AU-C 501.27):

a. evaluate the competence, capabilities, and objectivity of those specialists;

b. obtain an understanding of the work of those specialists; and

c. evaluate the appropriateness of those specialists' work as audit evidence for the significant assertion.[7]

.04 The nature, timing, and extent of audit procedures with regard to the requirement in FAM 625.03 may be affected by matters such as the following (AU-C 501.A72):

a. the nature and complexity of the matter to which the work of management's specialists relates;

b. the risks of material misstatement of the matter;

c. the availability of alternative sources of audit evidence;

d. the nature, scope, and objectives of the work of management's specialists;

e. whether management's specialists are employed by the entity or are engaged by it to provide relevant services;

f. the extent to which management can exercise control or influence over management's specialists (including, when applicable, the organization that employs an individual specialist), thereby influencing the work of its specialists;

g. whether management's specialists are subject to technical performance standards or other professional or industry requirements;

h. the nature and extent of any controls within the entity over the work of management's specialists;

[7] "Significant assertion" as used in the FAM is referred to as relevant assertion in AU-C 315.

i. the auditor's knowledge of, and experience with, the fields of expertise of management's specialists; and

j. the auditor's previous experience with the work of management's specialists.

More persuasive audit evidence is needed regarding the requirement in FAM 625.03 as the significance of the work of management's specialists, the risk of material misstatement at the assertion level, or the ability of management to affect the specialists' judgments increase, or as the competence, capabilities, and objectivity of specialists in the particular fields decrease.

.05 It is necessary to apply professional judgment when considering how the requirements of this section are affected by the fact that management's specialists may be either individuals or organizations. See FAM 620.17 for more information.

Evaluating the Competence, Capabilities, and Objectivity of Management's Specialists

.06 As discussed in FAM 625.03, the auditor should evaluate whether management's specialists have the necessary competence, capabilities, and objectivity for the auditor's purposes. See FAM 615 for additional guidance.

Obtaining an Understanding of the Work of Management's Specialists

.07 An understanding of the work of management's specialists includes an understanding of the relevant fields of expertise. An understanding of the relevant fields of expertise may be obtained in conjunction with the auditor's determination of whether the auditor has the expertise to evaluate the work of management's specialists or whether the auditor needs an auditor's specialist for this purpose (AU-C 501.A80) (see FAM 620).

.08 Aspects of the fields of expertise of management's specialists relevant to the auditor's understanding may include (AU-C 501.A81)

a. whether those specialists' fields include areas of specialty that are relevant to the audit;

b. whether any professional or other standards and legal or regulatory requirements apply;

c. what assumptions and methods are used by management's specialists and whether they are generally accepted within those specialists' fields and appropriately applied under the applicable financial reporting framework (generally U.S. GAAP); and

d. the nature of internal and external data or information management's specialists use.

.09 In the case of management's specialists engaged by the entity, there will ordinarily be an engagement letter or other written form of agreement between the entity and the specialist. Evaluating that agreement when obtaining an understanding of the work of management's specialists may assist the auditor in determining, for the auditor's purposes, the appropriateness of

a. the nature, scope, and objectives of those specialists' work;

b. the respective roles and responsibilities of management and those specialists; and

c. the nature, timing, and extent of communication between management and those specialists, including the form of any report to be provided by those specialists (AU-C 501.A82).

.10 In the case of management's specialists employed by the entity, it is less likely that there will be a written agreement of this kind. Inquiry of the specialists and other members of management may be the most appropriate way for the auditor to obtain the necessary understanding (AU-C 501.A83).

Evaluating the Appropriateness of the Work of Management's Specialists

.11 The auditor may use FAM 620.26, .28, and .30 through .35, adapted as necessary in the circumstances, for the level of review and example procedures for evaluating the appropriateness of the work of management's specialists.

.12 Considerations when evaluating the appropriateness of the work of management's specialists as audit evidence for the significant assertion may include

a. if the specialist's work involves significant assumptions, the appropriateness of the assumptions, taking into account the consistency of those assumptions with relevant information;

b. if the specialist's work involves the use of methods, the appropriateness of the methods under the circumstances, taking into account the requirements of the applicable financial reporting framework (generally U.S. GAAP);

c. if the specialist's work involves significant use of source data, including data produced by the entity, the relevance and reliability of those source data (see FAM 480.01); and

d. the relevance and reasonableness of the specialist's findings or conclusions, the consistency of the findings or conclusions with other audit evidence, and whether the findings or conclusions have been appropriately reflected in the financial statements (AU-C 501.A84).

See AU-C 501.A85 and .A86 for further guidance if the work of management's specialist involves the use of significant assumptions that a specialist developed or a proprietary model. Also see AU-C 540, *Auditing Accounting Estimates and Related Disclosures*, for requirements and guidance related to accounting estimates, including the selection and application of the methods, significant assumptions, and data used in making the accounting estimate.

.13 Factors that affect the relevance and reliability of the work of management's specialists include the following (AU-C 501.A87):

a. the results of the auditor's procedures over internal or external data, significant assumptions, and methods;

b. the nature of any restrictions, disclaimers, or limitations in the specialist's report or equivalent communication; and

c. the consistency of the work of the specialist with (1) other evidence the auditor obtained and (2) the auditor's understanding of the entity and its environment.

Additional procedures may be necessary if the findings or conclusions of management's specialists appear to contradict the significant assertion, or their work does not provide sufficient appropriate audit evidence (AU-C 501.A88). See AU-C 501.A88 for examples of situations in which additional procedures may be necessary.

Making Reference to Management's Specialists in the Auditor's Report

.14 See FAM 620.36 through .39 for guidance related to making reference to a specialist in the auditor's report.

Documentation

.15 In the overall audit strategy, the auditor should include or refer to other documentation where this information is described in more detail on the following areas:

a. determination of whether to use the work of management's specialists as audit evidence;

b. matters considered when determining the nature, timing, and extent of the auditor's procedures with respect to the requirements of this section;

c. understanding of the work of management's specialists; and

d. evaluation of whether management's specialists have the necessary competence, capabilities, and objectivity for the auditor's purposes.

.16 The auditor should document the evaluation of the appropriateness of the work of management's specialists as audit evidence for the significant assertion in the audit summary memorandum, including the auditor's conclusions on the

a. relevance and reasonableness of the findings and conclusions of management's specialists and their consistency with other audit evidence;

b. relevance and reasonableness of any significant assumptions and methods used by management's specialists; and

c. the relevance, completeness, and accuracy of any source data that are significant to the work of management's specialists.

In the memorandum, the auditor may refer to other documentation where this information is described in more detail.

630 – Audits of Group Financial Statements

Overview

.01 FAM 630 provides guidance to auditors on designing and performing a group audit.[8] AU-C 600A, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors),* also provides guidance in this area. This standard has different requirements depending on whether the group auditor elects to make reference or to not make reference to the work performed by the component auditors. Under various AU-C sections, the auditor of the group financial statements is also referred to as the group engagement partner, group engagement team, or group auditor; all of these terms are used interchangeably throughout this section.

.02 The objectives of the auditor are to determine whether to act as the auditor of the group financial statements and, if so, to

a. determine whether to make reference to the audit of a component auditor in the auditor's report on the group financial statements;

b. communicate clearly with component auditors; and

c. obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion about whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework (generally U.S. GAAP).

.03 The group engagement partner is responsible for the following:

a. directing, supervising, and performing the group audit engagement in compliance with professional standards, applicable legal and regulatory requirements, and the audit entity's policies and procedures and

b. determining whether the group auditor's report issued is appropriate in the circumstances.

.04 The group engagement team may use the work of component auditors. In the federal environment, component auditors may be used in various situations, such as audits of individual bureaus, agencies, funds, or other components performed by either IGs or IPA firms.

Determining Whether to Accept and Continue

.05 The group engagement partner should determine whether sufficient appropriate audit evidence can reasonably be expected to be obtained regarding the consolidation process and the financial information of the components on which to base the group audit opinion. For this purpose, the group engagement team should obtain an understanding of the group, its components, and their

[8] A group audit is the audit of group financial statements. Group financial statements are defined as financial statements that include the financial information of more than one component. Group financial statements also refer to combined financial statements aggregating the financial information prepared by components that are under common control. (AU-C 600A.11)

environments that is sufficient to identify components that are likely to be significant components (AU-C 600A.14).

.06 The group engagement partner should evaluate whether the group engagement team will be able to obtain sufficient appropriate audit evidence through the group engagement team's work or use of the work of component auditors (that is, through assuming responsibility for the work of component auditors or through making reference to the audit of a component auditor or report on internal control over financial reporting of a component auditor in the auditor's report) to act as the auditor of the group financial statements and report as such on the group financial statements (AU-C 600A.15 and AU-C 940.78). Factors in determining whether the group engagement team can act as the auditor of the group financial statements include the financial significance of the components for which the group engagement team is assuming responsibility and the extent to which the group financial statements' risks of material misstatement are included in those components (AU-C 600A.A18).

.07 In some circumstances, the group engagement partner may conclude that it will not be possible, due to restrictions imposed by group management, for the group engagement team to obtain sufficient appropriate audit evidence through the group engagement team's work or use of component auditors' work, and the possible effect of this inability will result in a disclaimer of opinion on the group financial statements. In such circumstances, the auditor of the group financial statements should refer to AU-C 600A.16.

Overall Audit Strategy and Audit Plan

.08 The group engagement team should establish both an overall group audit strategy and a group audit plan. In developing the group audit plan, the group engagement team should assess the extent to which the group engagement team will use the work of component auditors and whether the auditor's report on the group financial statements will make reference to the audit of a component auditor (AU-C 600A.18). The group engagement partner should review and approve the overall group audit strategy and group audit plan (AU-C 600A.19).

.09 The group engagement team should determine the level of review to be performed on the component auditor's audit work on the financial information of a component that will be used as audit evidence for the group audit. The level of review is a matter of professional judgment. In some situations, the group engagement team may determine that it is appropriate to perform significantly more work, including performing additional audit procedures. In other situations, the auditor may decide less review or no review is necessary. These situations typically involve entities or line items that are very small in relation to the financial statements as a whole. In these situations, the group engagement team may decide to read the component auditor's report and the financial statements and ask questions if anything seems unusual.

.10 As noted above, the extent of the group engagement team's review of the component auditor's documentation depends on the level of review and is a matter of professional judgment. The group engagement team should consider using the following framework in planning and performing the level of review of the component auditor's documentation:

For a **low level of review**, the group engagement team may limit the review of documentation to key summary planning and completion documentation.

For a **moderate level of review**, in addition to the documentation reviewed at the low level of review, the group engagement team should consider reviewing more of the component auditor's documentation, especially those documents evidencing important decisions. For financial statement audits, this includes the following or equivalent documents:

a. audit strategy and audit procedures;

b. line item risk analysis (LIRA) forms at FAM 395 H;

c. specific control evaluation (SCE) worksheets at FAM 395 G;

d. documentation for material line items, accounts, note disclosures, and classes of transactions with high risk of material misstatement;

e. overall analytical procedures;

f. audit completion checklist at FAM 1003;

g. audit summary memorandum;

h. summary of uncorrected misstatements at FAM 595 C; and

i. documentation of key decisions and significant judgments.

For a **high level of review**, the group engagement team should consider reviewing all of the items for the moderate level of review plus any important documentation, particularly relating to areas with significant risk, such as memorandums documenting key meetings and discussions with management, the evaluation of sample results, and the summary of uncorrected misstatements. In some cases, the group engagement team may determine that it should coordinate or concur with the component auditor's major planning decisions before audit work is started. Additionally, in some cases, the group engagement team should hold discussions with audited entity management and/or perform additional audit procedures in order to meet the relevant requirements of GAGAS.

Understanding the Group, Its Components, and Their Environments

.11 The auditor is required to identify and assess the risks of material misstatement by obtaining an understanding of the entity and its environment, the applicable financial reporting framework (generally U.S. GAAP), and the entity's internal control. The group engagement team should enhance its understanding of the group, its components, and their environments, including group-wide controls, obtained during the acceptance or continuance stage. (AU-C 600A.20)

The group engagement team should also obtain an understanding of the consolidation process, including the instructions that group management issued to components (AU-C 600A.20). Group management ordinarily issues instructions to components in order to achieve uniformity and comparability of financial information. A group engagement team's understanding of these instructions may include whether the instructions describe the financial reporting framework (generally U.S. GAAP), provide for disclosures consistent with the framework, and provide for component management's approval of the financial information. (AU-C 600A.A32–.A34)

.12 The group engagement team should obtain an understanding that is sufficient to

a. confirm or revise its initial identification of components that are likely to be significant and

b. assess the risks of material misstatement of the group financial statements, whether due to fraud or error (AU-C 600A.21).

The group engagement team's assessment of the risks of material misstatement of the group financial statements is based on information such as the following (AU-C 600A.A38–.A39):

a. information obtained based on understanding of the group, its components, and their environments and of the consolidation process, including audit evidence obtained in evaluating the design and implementation of group-wide controls and controls that are relevant to the consolidation (refer to appendix B at AU-C 600A.A95 for examples of conditions or events that may indicate risks of material misstatement of the group financial statements), and

b. information obtained from the component auditors.

.13 The auditor is required to identify and assess the risks of material misstatement of the financial statements due to fraud or error and to design and implement appropriate responses to the assessed risk. Information used to identify the risks of material misstatement of the group financial statements due to fraud may include the following (AU-C 600A.A35):

a. group management's assessment of the risks that the group financial statements may be materially misstated as a result of fraud or error;

b. group management's process for identifying and responding to the risks of fraud or error in the group, including any specific fraud risks that group management identified or line items, accounts, note disclosures, or classes of transactions, for which a risk of fraud is likely;[9]

c. whether particular components exist for which a risk of fraud or error is likely;

d. how those charged with governance of the group monitor group management's processes for identifying and responding to the risks of fraud or error in the group and the controls group management has established to mitigate these risks; and

e. responses of those charged with governance of the group, group management, and appropriate individuals within the internal audit function (and, if considered appropriate, component management, the component auditors, and others) to the group engagement team's inquiry of whether they have knowledge of any actual, suspected, or alleged fraud or error affecting a component or the group.

Understanding the Component Auditor

.14 Regardless of whether reference will be made in the auditor's report on the group financial statements to the audit of a component auditor, the group engagement team should obtain an understanding of the following (AU-C 600A.22):

[9]AU-C 600A discusses audit procedures for classes of transactions, account balances, and disclosures. The FAM discusses audit procedures for line items, accounts, note disclosures, and classes of transactions. The FAM uses line item to describe an aggregation of account balances. The FAM refers to information in the notes to the financial statements as note disclosures.

a. whether a component auditor understands and will comply with the ethical requirements relevant to the group audit and, in particular, is independent;

b. a component auditor's professional competence;

c. the extent, if any, to which the group engagement team will be able to be involved in the work of the component auditor;

d. whether the group engagement team will be able to obtain information affecting the consolidation process from a component auditor; and

e. whether a component auditor operates in a regulatory environment that actively oversees auditors.

See FAM 615 for requirements related to evaluating the component auditor's independence, objectivity, and qualifications.

.15 When a component auditor does not meet the independence requirements that are relevant to the group audit or the group engagement team has serious concerns about the other matters listed in FAM 630.14 regarding the component auditor's independence and professional competence, the group engagement team should obtain sufficient appropriate audit evidence relating to the component's financial information without making reference to the audit of that component auditor in the auditor's report on the group financial statements or otherwise using the work of that component auditor (AU-C 600A.23).

Determining Whether to Make Reference to a Component Auditor in the Auditor's Report on the Group Financial Statements

.16 Having gained an understanding of each component auditor, the group engagement partner should decide whether to make reference to a component auditor in the auditor's report on the group financial statements. (AU-C 600A.24) The decision about whether to make reference to a component auditor in the report on the audit of internal control over financial reporting might differ from the corresponding decision as it relates to the audit of the financial statements (AU-C 940.A128).

.17 Reference to the audit of a component auditor in the auditor's report on the group financial statements or on internal control over financial reporting over the group financial statements should not be made unless

a. the group engagement partner has determined that the component auditor has performed an audit of the financial statements of the component or of the component's internal control over financial reporting in accordance with the relevant requirements of GAGAS and

b. the component auditor has issued an auditor's report that is not restricted as to use (AU-C 600A.25 and AU-C 940.79).

.18 For situations in which the component's financial statements are prepared using a different financial reporting framework than that used for the group financial statements, see AU-C 600A.26.

Making Reference in the Auditor's Report

.19 When the group engagement partner decides to make reference to the audit of a component auditor in the auditor's report on the group financial statements, the

group engagement team should obtain sufficient appropriate audit evidence with regard to such components by performing the following procedures (AU-C 600A.27):

a. completing the procedures required by FAM 630, except for those required in FAM 630.56 through .74, and

b. reading the component's financial statements and the component auditor's report thereon to identify significant findings and issues and, when considered necessary, communicating with the component auditor in this regard.

.20 When the group engagement partner decides to make reference to the audit of a component auditor in the auditor's report on the group financial statements, the report on the group financial statements should clearly indicate the following (AU-C 600A.28):

a. that the component was not audited by the auditor of the group financial statements but was audited by the component auditor;

b. the magnitude of the portion of the financial statements that the component auditor audited;

c. when the component's financial statements are prepared using a different financial reporting framework than that used for the group financial statements,

- the financial reporting framework used by the component and
- that the auditor of the group financial statements is taking responsibility for evaluating the appropriateness of the adjustments to convert the component's financial statements to the financial reporting framework used by the group; and

d. when

- the component auditor's report on the component's financial statements does not state that the audit was performed in accordance with GAGAS and
- the group engagement partner has determined that the component auditor performed additional audit procedures in order to meet the relevant requirements of GAGAS,
  - the set of auditing standards used by the component auditor and
  - that additional audit procedures were performed by the component auditor to meet the relevant requirements of GAGAS.

.21 If the group engagement partner decides to name a component auditor in the auditor's report on the group financial statements, the component auditor's express permission should be obtained and the component auditor's report should be presented together with that of the auditor's report on the group financial statements (AU-C 600A.29). For IPA firms, this permission may be obtained as part of the contracting process. As a professional courtesy, the group engagement team generally should also provide component auditors with a draft of its report so that the auditors can read the report before final issuance.

.22 When the auditor of the group's internal control audit decides to make reference to the report of the component auditor as a basis, in part, for the auditor's opinion on the group's internal control, the auditor should modify the report on internal control over financial reporting.

.23 If the group engagement partner decides to assume responsibility for work of a component auditor, no reference should be made to the component auditor in the auditor's report on the group financial statements (AU-C 600A.31).

Materiality

.24 The group engagement team should determine the following (AU-C 600A.32):

a. Materiality, including performance materiality, for the group financial statements as a whole when establishing the overall group audit strategy.

b. Whether, in the specific circumstances of the group, particular line items, accounts, note disclosures, or classes of transactions in the group financial statements exist for which there is a substantial likelihood that misstatements of lesser amounts than materiality for the group financial statements as a whole would influence the judgment made by a reasonable user based on the group financial statements. In such circumstances, the group engagement team should determine materiality to be applied to those particular line items, accounts, note disclosures, or classes of transactions.

c. Component materiality for those components on which the group engagement team will perform, or for which the auditor of the group financial statements will assume responsibility for the work of a component auditor who performs, an audit or a review. Determining component materiality should take into account all components, regardless of whether reference is made in the auditor's report on the group financial statements to the audit of a component auditor. To reduce the risk that the aggregate of uncorrected and undetected misstatements in the group financial statements exceeds the materiality for the group financial statements as a whole, component materiality should be lower than the materiality for the group financial statements as a whole, and component performance materiality should be lower than performance materiality for the group financial statements as a whole. Different materiality may be established for different components, and the aggregate component materiality may exceed the group materiality (see AU-C 600A.A64–.A66 for further guidance).

d. The threshold above which misstatements cannot be regarded as clearly trivial to the group financial statements.

See FAM 630.56 for additional requirements when assuming responsibility for the work of a component auditor.

Responding to Assessed Risk

.25 The auditor is required to design and implement appropriate responses to address the assessed risks of material misstatement of the financial statements. If the nature, timing, and extent of the work to be performed on the consolidation process or the component's financial information are based on an expectation that group-wide controls are operating effectively, or when substantive procedures alone cannot provide sufficient appropriate audit evidence at the

assertion level, the group engagement team should test, or have a component auditor test on the group engagement team's behalf, the operating effectiveness of those controls over specified risks that present a reasonable possibility of material misstatement to the group financial statements (AU-C 600A.33 and AU-C 940.82). See FAM 630.66 for additional audit procedures when assuming responsibility for the work of a component auditor.

.26 Responses to assessed risks of material misstatement for some or all accounts may be implemented at the group level, without involving the component auditors, if deemed appropriate by the group engagement team (AU-C 600A.A68).

.27 In determining the components at which to perform tests of controls, the group engagement team should assess the risk of material misstatement to the financial statements associated with the component and correlate the amount of attention devoted to a component with the degree of risk (AU-C 940.81).

Consolidation Process

.28 In accordance with FAM 630.11, the group engagement team obtains an understanding of group-wide controls and the consolidation process, including the instructions that group management issued to components. In accordance with FAM 630.25, the group engagement team, or component auditor at the request of the group engagement team, tests the operating effectiveness of group-wide controls if the nature, timing, and extent of the work to be performed on the consolidation process are based on an expectation that group-wide controls are operating effectively or when substantive procedures alone cannot provide sufficient appropriate audit evidence at the assertion level (AU-C 600A.34).

.29 The group engagement team should design and perform further audit procedures on the consolidation process to respond to the assessed risks of material misstatement of the group financial statements arising from the consolidation process. This should include evaluating whether all components have been included in the group financial statements (AU-C 600A.35).

.30 The group engagement team should evaluate the appropriateness, completeness, and accuracy of consolidation adjustments and reclassifications and should evaluate whether any fraud risk factors or indicators of possible management bias exist (AU-C 600A.36). The group engagement team's evaluation may include (1) evaluating whether significant adjustments reflect actual events and determining if the adjustments were correctly calculated and supported and (2) checking the reconciliation of intragroup account balances (AU-C 600A.A69).

.31 If the financial information of a component has not been prepared in accordance with the same accounting policies applied to the group financial statements, the group engagement team should evaluate whether the financial information of that component has been appropriately adjusted for purposes of the preparation and fair presentation of the group financial statements in accordance with the applicable financial reporting framework (generally U.S. GAAP) (AU-C 600A.37).

.32 The group engagement team should determine whether the financial information identified in a component auditor's communication is the financial information that is incorporated in the group financial statements (AU-C 600A.38).

.33 If the group financial statements include the financial statements of a component with a financial reporting period end that differs from that of the group, the group engagement team should evaluate whether appropriate adjustments have been made to those financial statements in accordance with the applicable financial reporting framework (generally U.S. GAAP) (AU-C 600A.39).

Subsequent Events

.34 When the group engagement team or component auditors perform audits on the financial information of components, the group engagement team or the component auditors should perform procedures designed to identify events at those components that occur between the dates of the financial information of the components and the date of the auditor's report on the group financial statements and that may require adjustment to, or disclosure in, the group financial statements. See FAM 630.68 for additional requirements when assuming responsibility for the work of a component auditor (AU-C 600A.40).

.35 The group engagement team may ask the component auditors to update the subsequent events review to the required date, or the group engagement team may update the subsequent events review. However, since this requires additional work, the group engagement team should attempt to complete audit work when the component auditors complete their work. The group engagement team should evaluate this issue and coordinate with the component auditors when planning the audit.

Communication with the Component Auditor

.36 The group engagement team should communicate its requirements to a component auditor on a timely basis. This communication should include the following:

a. A request that the component auditor, knowing the context in which the group engagement team will use the component auditor's work, confirm that the component auditor will cooperate with the group engagement team (AU-C 600A.41a).

b. The ethical requirements relevant to the group audit, in particular, the independence requirements (AU-C 600A.41b).

c. A list of disclosure entities, related parties, and public-private partnerships that group management prepared and any other related parties of which the group engagement team is aware, including the nature of the entity's relationships and transactions with those parties.[10] The group engagement team should request that the component auditor communicate on a timely basis disclosure entities, related parties, and public-private partnerships that

[10]Under Federal Accounting Standards Advisory Board (FASAB) standards, organizations are considered to be related parties if the existing relationship or one party to the existing relationship has the ability to exercise significant influence over the other party's policy decisions. In the federal government, there are additional relationships that present risks similar to related parties, as defined by FASAB. These include disclosure entities and public-private partnerships. Consequently, while the AICPA auditing standards address only related parties, the auditor should apply audit procedures required for related parties to disclosure entities and public-private partnerships. Note that FASAB and the Financial Accounting Standards Board (FASB) provide different definitions for related parties. Procedures pertaining to disclosure entities and public-private partnerships do not apply to entities issuing financial statements in accordance with FASB accounting standards.

group management or the group engagement team did not previously identify. The group engagement team should identify such additional disclosure entities, related parties, and public-private partnerships to other component auditors. (AU-C 600A.41c)

d. Identified significant risks of material misstatement of the group financial statements, due to fraud or error, that are relevant to the component auditor's work (AU-C 600A.41d).

e. Any significant deviations in the methodologies or audit approaches that the component auditor uses that are different from those the group engagement team would have used and whether those deviations comply with GAGAS.

.37 The group engagement team should request that a component auditor communicate matters relevant to the group engagement team's conclusion with regard to the group audit. Such communication should include the following (AU-C 600A.42):

a. whether the component auditor has complied with ethical requirements relevant to the group audit, including independence and professional competence;

b. identification of the financial information of the component on which the component auditor is reporting; and

c. the component auditor's overall findings, conclusions, or opinion.

See FAM 630.69 through .73 for additional requirements when assuming responsibility for the work of a component auditor.

Evaluating the Sufficiency and Appropriateness of Audit Evidence

.38 The group engagement team should evaluate a component auditor's communication (see FAM 630.36). The group engagement team should discuss significant findings and issues arising from that evaluation with the component auditor, component management, or group management, as appropriate (AU-C 600A.43).

.39 The auditor is required to obtain sufficient appropriate audit evidence on which to base the audit opinion. The group engagement team should evaluate whether sufficient appropriate audit evidence on which to base the group audit opinion has been obtained from the audit procedures performed on the consolidation process and the work performed by the group engagement team and the component auditors on the financial information of the components (AU-C 600A.44). If the group engagement team concludes that sufficient evidence has not been obtained, the group engagement team may request that the component auditor perform additional procedures or may alternatively perform its own procedures (AU-C 600A.A71). If the group engagement team has concerns about whether the component auditor's work provides sufficient appropriate evidence, the group engagement team generally should discuss the matter with the group engagement partner before formally discussing the issue with the component auditor.

.40 Sometimes component auditors use methodologies or audit approaches that are different from those that the group engagement team would have used. Auditing requires a great deal of professional judgment, and there often are alternative ways to achieve audit objectives. Many IPA firms have developed, at

considerable expense, proprietary audit methodologies to use on a wide range of public and private sector clients. Thus, the group engagement team generally should understand the component auditor's audit methodology and basis for the nature, extent, and timing of audit procedures. This may require obtaining permission to use proprietary software to review the audit documentation. Additionally, where the IPA firm software is retained, the group engagement team should develop a process to maintain the operability of the software to access the audit documentation in the future.

As noted at FAM 630.36.e, the group engagement team should communicate its requirements for a component auditor to communicate any significant deviations in the methodologies or audit approaches used that are different from those that the group engagement team would have used and whether those deviations comply with GAGAS.

.41 The group auditor should determine the significance of the test results to the audit of the financial statements on which the component auditor is reporting. For example, the component auditor may have selected a nonstatistical sample or the sample size may be smaller than the sample size the group auditor would have selected. The group auditor may decide that this provides sufficient evidence in an area that is less material or has low or moderate risk of material misstatement. However, if the risk of material misstatement is high, the group auditor may conclude that sufficient appropriate evidence has not been obtained and that additional work is needed.

In this case, after consulting with the group engagement partner, the group engagement team generally should either ask the component auditor to perform additional tests or perform the additional tests itself. If this additional testing is not done, the group engagement team should determine the effect of any scope limitation on the group auditor's report.

.42 Sometimes, the group engagement team may disagree with the conclusions or judgments of the component auditors. In such a case, the group engagement team should evaluate the component auditor's work as well as any other evidence or testing necessary to determine the appropriate conclusion.

.43 The group engagement team should discuss any issues of disagreement with the component auditors to attempt to resolve the disagreements. The group engagement team should attempt to resolve professional disagreements early to reduce confusion that may arise from differing auditor views. Once issues of disagreements are identified, the group engagement team should discuss the issues with the component auditors to resolve them in a timely manner and before the completion of the audit.

.44 If the group engagement team does not reach agreement with the component auditors, the group engagement team should determine the impact that such disagreement may have on its audit report.

.45 The group engagement partner should evaluate the effect on the group audit opinion of any uncorrected misstatements (either identified by the group engagement team or communicated by component auditors) and any instances in which there has been an inability to obtain sufficient appropriate audit evidence (AU-C 600A.45).

.46 If a component auditor disclaims an opinion on the financial statements because of a scope limitation, the group engagement team should consider the effect on

the group auditor's opinion. The group engagement team should confirm the nature and magnitude of the reason for the disclaimer. Additionally, the group engagement team generally need not hold discussions with entity management and/or perform additional audit procedures in this situation, and may limit the review of documentation to summary documentation. However, the group engagement team may do additional work to learn about the entity, to help the component auditor plan future audits, or to help entity management correct the causes of the scope limitation.

.47 If the component auditor's work had a scope limitation that results in a qualified opinion, the group engagement team should confirm the nature and magnitude of the reason for the qualification and determine the effect on the group auditor's opinion.

Communication with Group Management and Those Charged with Governance

.48 The group engagement team should communicate to group management and those charged with governance of the group material weaknesses and significant deficiencies in internal control that are relevant to the group (either identified by the group engagement team or brought to its attention by a component auditor during the audit) (AU-C 600A.46).

.49 If fraud has been identified by the group engagement team or brought to its attention by a component auditor or if information indicates that a fraud may exist, the group engagement team should communicate this on a timely basis to the appropriate level of group management in order to inform those with primary responsibility for preventing and detecting fraud of matters relevant to their responsibilities (AU-C 600A.47).

.50 When a component auditor has been engaged to express an audit opinion on the financial statements of a component, the group engagement team should request that group management inform component management of any matter of which the group engagement team becomes aware that may be significant to the financial statements of the component, but of which component management may be unaware. If group management refuses to communicate the matter to component management, the group engagement team should discuss the matter with those charged with governance of the group. If the matter remains unresolved, the group engagement team should refer to AU-C 600A.48.

.51 The group engagement team should communicate the following matters, in addition to those discussed in FAM 215.36 and 550.19, to those charged with governance of the group (AU-C 600A.49):

a. an overview of the type of work to be performed on the financial information of the components, including the basis for the decision to make reference to the audit of a component auditor in the auditor's report on the group financial statements;

b. an overview of the nature of the group engagement team's planned involvement in the work that the component auditors are to perform on the financial information of significant components;

c. instances in which the group engagement team's evaluation of a component auditor's work gave rise to a concern about the quality of that auditor's work;

d. any limitations on the group audit (for example, when the group engagement team's access to information may have been restricted); and

e. fraud or suspected fraud involving group management, component management, employees who have significant roles in group-wide controls, or others in which a material misstatement of the group financial statements has or may have resulted from fraud.

Documentation

.52 The group engagement team should include the following in the audit documentation (AU-C 600A.50):

a. an analysis of components indicating those that are significant and the type of work performed on the financial information of the components;

b. those components for which reference to the reports of component auditors is made in the auditor's report on the group financial statements;

c. written communications between the group engagement team and the component auditors about the group engagement team's requirements; and

d. for those components for which reference is made in the auditor's report on the group financial statements to the audit of a component auditor,

- the financial statements of the component and the report of the component auditor thereon and
- when the component auditor's report on the component's financial statements does not state that the audit of the component's financial statements was performed in accordance with GAGAS (which incorporates U.S. GAAS) or the standards promulgated by the PCAOB, the basis for the group engagement partner's determination that the component auditor's audit met the relevant requirements of GAGAS.

See FAM 630.74 for additional requirements when assuming responsibility for the work of a component auditor.

.53 In addition, when the group engagement team performs additional audit procedures, the group engagement team's documentation should contain a description of the work (this may be a list of the documents the auditor examined or tick marks on a copy of the component auditor's documentation if that is the basis for the selection) and the group engagement team's conclusion. It is not necessary to retain copies of the documents examined.

.54 There is a difference between the group engagement team's responsibilities to review the documentation of component auditors and what the group engagement team may copy and retain from that documentation. The group engagement team uses professional judgment in deciding which of the component auditor's documents to copy and retain. However, many auditors use electronic technology to retain documentation for the entire audit. The group engagement team may cite this documentation as part of the review to include any additional audit procedures performed on the component auditor's work. The group engagement team may print any documents as necessary.

.55 The group engagement team may retain other documentation if it might be useful in understanding the entity, training staff members, planning future audits, reviewing the documentation, or writing the report. Documentation in this

category includes the entity profile (or equivalent), audit strategy, audit procedures, LIRA forms and SCE worksheets (or equivalent), trial balance or lead schedules, management representation letter, and legal counsel response. Auditors often find it helpful to keep copies of documents (either electronically or in hard copy) in case questions are raised in review but not to include those copies in the audit documentation unless they are needed to document the work performed.

The group engagement team should retain documents in accordance with the contract or other legal requirements, but not less than 5 years from the report release date (AU-C 230.17). Audit procedures may indicate which documents to retain. These documents should be included in the final audit file by the documentation completion date (no later than 60 days after the report release date). The auditor should not discard documents between the documentation completion date and the end of the specified retention period (AU-C 230.16 through .17). In documenting the review, auditors may indicate the document number or index number used by the component auditor in order to locate the document at a later date.

Ownership and confidentiality of audit documentation is determined by contract and other legal requirements (see AU-C 230.A29).

See FAM 630.74 for additional requirements when assuming responsibility for the work of a component auditor.

Additional Procedures if Assuming Responsibility for a Component Auditor's Work

Materiality

.56 During an audit of a component's financial information in which the auditor of the group financial statements is assuming responsibility for the component auditor's work, the group engagement team should evaluate the appropriateness of performance materiality at the component level (AU-C 600A.51).

Determining the Type of Work to Be Performed on the Financial Information of Components

.57 For components for which the auditor of the group financial statements is assuming responsibility for the component auditors' work, the group engagement team should determine the type of work to be performed by the group engagement team or by component auditors on its behalf on the components' financial information. The group engagement team also should determine the nature, timing, and extent of its involvement in the work of component auditors (see FAM 630.09 through .10 for a suggested framework for planning and performing a low, moderate, or high level of review of the component auditor's documentation) (AU-C 600A.52).

.58 The group engagement team alone is responsible for determining the extent of additional procedures, if any, based on professional judgment. This determination in no way constitutes a reflection on the adequacy of the auditor's work.

.59 The objective of these additional procedures is for the group engagement team to obtain additional evidence about whether key items are properly handled and

supported by sufficient appropriate evidence. For example, the group engagement team generally should discuss key items with entity management, especially estimates and judgments. This discussion generally should be conducted with the component auditors present. The group engagement team generally should attend the entrance and exit conferences and other key meetings held by component auditors. For key items that have high risk of material misstatement, discussions with entity management may not provide sufficient evidence, and the group auditor should perform additional audit procedures.

.60 The group engagement team may perform additional audit procedures on a selection of the component auditor's work, and/or additional tests of the accounting records. To perform additional audit procedures, the group engagement team should obtain access to the entity's personnel and its books and records. The group engagement team may coordinate access to the entity's personnel and records through the component auditor. The group engagement team and the component auditor also may jointly perform parts of a test, where the audit sample is planned jointly and the results are evaluated jointly. Although additional audit procedures are usually performed only when the level of review is high, the group engagement team may perform additional audit procedures in other situations to learn about the entity, to help the component auditor plan future audits, or to help entity management correct problems.

.61 The group engagement team generally should limit discussions with entity management and/or additional audit procedures to significant assertions in line items that have a high risk of material misstatement. This is especially true in areas involving estimates and judgments or in areas on which users place extensive reliance. The group engagement team's additional audit procedures generally should include some items tested by the component auditor, particularly any that appear to be exceptions, in order to determine whether they were appropriately evaluated in formulating an opinion. The group engagement team generally should plan to perform additional audit procedures while the component auditors are at the entity and have access to records, as this can minimize the inconvenience for everyone.

Significant Components

.62 For a component that is significant due to its individual financial significance to the group, the group engagement team, or a component auditor on its behalf, should perform an audit of the financial information of the component, adapted as necessary to meet the needs of the group engagement team, using component materiality (AU-C 600A.53).

.63 For a component that is significant not due to its individual financial significance but because it is likely to include significant risks of material misstatement of the group financial statements due to its specific nature or circumstances, the group engagement team, or a component auditor on its behalf, should perform one or more of the following (AU-C 600A.54):

a. an audit, adapted as necessary to meet the needs of the group engagement team, of the financial information of the component, using component materiality;

b. an audit, adapted as necessary to meet the needs of the group engagement team, of one or more line items, accounts, note disclosures, or classes of

transactions relating to the likely significant risks of material misstatement of the group financial statements; or

c. specified audit procedures relating to the likely significant risks of material misstatement of the group financial statements.

Components That Are Not Significant

.64 For components that are not significant components, the group engagement team should perform analytical procedures at the group level (AU-C 600A.55).

.65 In some circumstances, the group engagement team may determine that sufficient appropriate audit evidence on which to base the group audit opinion will not be obtained from the following (AU-C 600A.56):

a. the work performed on the financial information of significant components,

b. the work performed on group-wide controls and the consolidation process, or

c. the analytical procedures performed at group level.

In such circumstances, the group engagement team should select additional components that are not significant components and should perform or request that a component auditor perform one or more of the following on the financial information of the individual components selected (AU-C 600A.56):

a. an audit, adapted as necessary to meet the needs of the group engagement team, of the financial information of the component, using component materiality;

b. an audit, adapted as necessary to meet the needs of the group engagement team, of one or more line items, accounts, note disclosures, or classes of transactions;

c. a review of the financial information of the component, adapted as necessary to meet the needs of the group engagement team, using component materiality; or

d. specified audit procedures.

The group engagement team should vary the selection of such individual components over a period of time (AU-C 600A.56).

Involvement in the Work Performed by Component Auditors

Significant Components – Risk Assessment

.66 When a component auditor performs an audit or other specified audit procedures of the financial information of a significant component for which the auditor of the group financial statements is assuming responsibility for the component auditor's work, the group engagement team should be involved in the risk assessment of the component to identify significant risks of material misstatement of the group financial statements. The nature, timing, and extent of this involvement are affected by the group engagement team's understanding of the component auditor but, at a minimum, should include the following (AU-C 600A.57):

a. discussing with the component auditor or component management the component's business activities of significance to the group,

b. discussing with the component auditor the susceptibility of the component to material misstatement of the financial information due to fraud or error, and

c. reviewing the component auditor's documentation of identified significant risks of material misstatement of the group financial statements—such documentation may take the form of a memorandum that reflects the component auditor's conclusion with regard to the identified significant risks.

Further Audit Procedures for Identified Significant Risk of Material Misstatement of the Group Financial Statements

.67 When significant risks of material misstatement of the group financial statements have been identified at a component for which the auditor of the group financial statements is assuming responsibility for the work of the component's auditor, the group engagement team should evaluate the appropriateness of the further audit procedures to be performed to respond to the identified significant risks of material misstatement of the group financial statements. Based on its understanding of the component auditor, the group engagement team should determine whether it is necessary to be involved in the further audit procedures (AU-C 600A.58).

Subsequent Events

.68 When component auditors perform work other than audits of the components' financial information at the request of the group engagement team, the group engagement team should request that the component auditors notify the group engagement team if they become aware of events at those components that occur between the dates of the financial information of the components and the date of the auditor's report on the group financial statements that may require an adjustment to, or disclosure in, the group financial statements (AU-C 600A.59).

Communication with a Component Auditor

.69 When the auditor of the group financial statements is assuming responsibility for the work of a component auditor, the communication required in FAM 630.36 should set out the work to be performed and the form and content of the component auditor's communication with the group engagement team. It also should include, in the case of an audit or review of the financial information of the component, component materiality (and the amount or amounts lower than the materiality for particular line items, accounts, note disclosures, or classes of transactions, if applicable) and the threshold above which misstatements cannot be regarded as clearly trivial to the group financial statements (AU-C 600A.60).

.70 When the auditor of the group financial statements is assuming responsibility for the work of a component auditor, the communication requested from the component auditor, as required in FAM 630.37, also should include the following (AU-C 600A.61):

a. Whether the component auditor has complied with the group engagement team's requirements.

b. Information on instances of noncompliance with provisions of applicable laws or regulations at the component or group level that could give rise to a material misstatement of the group financial statements.

c. Significant risks of material misstatement of the group financial statements, due to fraud or error, identified by the component auditor in the component and the component auditor's responses to such risks. The group engagement team should request that the component auditor communicate such significant risks on a timely basis.

d. A list of corrected and uncorrected misstatements of the financial information of the component (the list need not include misstatements that are below the threshold for clearly trivial misstatements communicated by the group engagement team).

e. Indicators of possible management bias regarding accounting estimates and the application of accounting principles.

f. Descriptions of any identified material weaknesses and significant deficiencies in internal control at the component level.

g. Other significant findings and issues that the component auditor communicated or expects to communicate to those charged with governance of the component, including fraud or suspected fraud involving component management, employees who have significant roles in internal control at the component level, or others that resulted in a material misstatement of the component's financial information.

h. Any other matters that may be relevant to the group audit or that the component auditor wishes to draw to the attention of the group engagement team, including exceptions noted in the written representations that the component auditor requested from component management.

Evaluating a Component Auditor's Communication and Adequacy of the Component Auditor's Work

.71 The group engagement team should determine, based on the evaluation required in FAM 630.38, whether it is necessary to review other relevant parts of a component auditor's audit documentation (see FAM 630.09 through .10 for a suggested framework for planning and performing a low, moderate, or high level of review of the component auditor's documentation) (AU-C 600A.62).

.72 If the group engagement team concludes that the work of a component auditor is insufficient, the group engagement team should determine additional procedures to be performed and whether they are to be performed by the component auditor or by the group engagement team (AU-C 600A.63).

Communication with Group Management and Those Charged with Governance

.73 If assuming responsibility for the component auditors' work, the group engagement team should determine which material weaknesses and significant deficiencies in internal control that component auditors have brought to the attention of the group engagement team should be communicated to group management and those charged with governance of the group (AU-C 600A.64).

Documentation

.74 The group engagement team should include in the audit documentation the nature, timing, and extent of the group engagement team's involvement in the

work performed by the component auditors on significant components, including, when applicable, the group engagement team's review of relevant parts of the component auditors' audit documentation and conclusions thereon (AU-C 600A.65).

640 – Entities Using a Service Organization

Overview

.01 FAM 640 provides guidance to auditors when considering the services provided to the entity by a service organization. As discussed in FAM 320, the auditor should obtain an understanding of how the entity uses the services of a service organization in the entity's operations for assessing risk and planning other audit procedures.[11]

.02 Many entities outsource aspects of their business activities to organizations that provide services ranging from performing a specific task under the direction of the entity to replacing entire business units or functions of the entity. Many of the services provided by such organizations are integral to an entity's business operations; however, not all of those services are relevant to an audit (AU-C 402.02). Services provided by service organizations that may be relevant to an audit include maintenance of the entity's accounting records; management of the entity's assets; and initiating, authorizing, recording, or processing transactions as an agent of the entity.

.03 Services provided by a service organization are relevant to the audit of an entity's financial statements when those services and the controls over them affect the entity's information system relevant to the preparation of the financial statements. Most controls at a service organization are likely to be part of the entity's information system relevant to the preparation of the financial statements or other related controls, such as controls over the safeguarding of assets. (AU-C 402.03)

A service organization's services are part of an entity's information system if these services affect any of the following (AU-C 402.03):

a. How information relating to material line items, accounts, note disclosures, and classes of transactions flows through the entity's information system, whether manually or using information technology, and whether obtained from within or outside the general ledger and subsidiary ledgers. This includes when the service organization affects the following:

   - how transactions are initiated and how information about them is recorded, processed, corrected as necessary, and incorporated in the general ledger and reported in the financial statements and
   - how information about events or conditions, other than transactions, is captured, processed, and disclosed by the entity in the financial statements.

b. the accounting records, specific accounts in the entity's financial statements, and other supporting records relating to the flows of information described in FAM 640.03a.

[11] In this section, "entity" refers to the user entity and "auditor" refers to the user auditor as defined in AU-C 402, *Audit Considerations Relating to an Entity Using a Service Organization*. AU-C 402 defines (1) user entity as an entity that uses a service organization and whose financial statements are being audited and (2) user auditor as an auditor that audits and reports on the financial statements of a user entity.

c. the financial reporting process used to prepare the entity's financial statements from the records described in FAM 640.03b, including as it pertains to (1) note disclosures and (2) accounting estimates relating to material line items, accounts, note disclosures, and classes of transactions.

d. the entity's IT environment relevant to FAM 640.03a through .03c.

.04 The nature and extent of work to be performed by the auditor regarding the services provided by a service organization depend on the nature and significance of those services to the entity and the relevance of those services to the audit (AU-C 402.04). If the service organization's control activities are included in the SCE worksheet,[12] then the auditor should follow the guidance outlined in the remaining paragraphs of this section.

.05 In responding to the assessed risks of material misstatement in accordance with FAM 420, the auditor should determine whether sufficient appropriate audit evidence concerning the significant assertions is available from records held at the entity. If not, then the auditor should perform further audit procedures to obtain sufficient appropriate audit evidence or use another auditor to perform those procedures at the service organization on the auditor's behalf (AU-C 402.15). For example, the auditor may consider (1) inspecting records and documents held by the service organization or (2) obtaining confirmations of balances and transactions from the service organization (AU-C 402.A28). Alternatively, a service auditor may perform procedures under an agreed-upon procedures engagement that are substantive in nature for the benefit of the auditor (AU-C 402.A29).

.06 OMB audit guidance states that for those service organization controls likely to be relevant to the entity's internal control over financial reporting, service organizations must provide the entity with an auditor's report or allow auditors to perform appropriate tests of controls at the service organization.[13] A service organization may provide the entity with one of the following (AU-C 402.08):

a. **Type 1 report** – a report on management's description of a service organization's system and a service auditor's report on that description and on the suitability of the design of controls.

b. **Type 2 report** – a report on management's description of a service organization's system and a service auditor's report on that description and on the suitability of the design and operating effectiveness of controls.[14]

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[12]"Control activities" as used in the FAM are referred to as controls in the control activities component in AU-C 540, *Auditing Accounting Estimates and Related Disclosures*.

[13]The OMB audit guidance in effect as of the publication date of this version of the FAM is OMB Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*, issued on July 29, 2024. This bulletin can be found at https://www.whitehouse.gov/wp-content/uploads/2024/07/OMB-Bulletin-No.-24-02.pdf (accessed May 29, 2026). OMB audit guidance is updated periodically. Users should refer to the OMB audit guidance applicable to the current financial audit.

[14]Type 1 and type 2 reports focus on controls likely to be relevant to entities' internal control over financial reporting, issued under AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting.* There are other types of reports on service organizations that may be available, including reports on controls at a service organization other than those likely to be relevant to entities' internal control over financial reporting (for example, controls that are relevant to entities' compliance with specified requirements of laws, regulations, contracts, or grant agreements).

Typically, the auditor will obtain a type 2 report that provides audit evidence about whether controls at the service organization are operating effectively. FAM 640 A provides an assessment tool designed to assist the auditor in evaluating a type 2 report that can provide audit evidence about whether controls at a service organization are operating effectively and support the auditor's risk assessment and report on internal control over financial reporting.

.07 In determining the sufficiency and appropriateness of the audit evidence provided by a type 1 or type 2 report, the auditor should be satisfied regarding the following (AU-C 402.13):

a. the service auditor's professional competence and independence from the service organization (also see FAM 615) and

b. the adequacy of the standards under which the type 1 or type 2 report was issued.

.08 The auditor generally should obtain and review a type 1 or type 2 report, if available, to determine if it contains information that may affect the audit or increase the risks of material misstatement, even if the auditor does not plan to rely on the report to support the auditor's risk assessment or report on internal control over financial reporting.

.09 The auditor should not refer to the work of a service auditor in the auditor's report containing an unmodified opinion (AU-C 402.21). Based on AU-C 940.96, the auditor also should not refer to the service auditor's report in the report on internal control over financial reporting.

Evaluate the Design and Implementation of Controls

.10 As discussed in FAM 350.10, the auditor should determine whether the entity has implemented relevant control activities that relate to the services provided by the service organization.[15] The auditor should determine whether a sufficient understanding of the nature and significance of the services provided by the service organization and their effect on the entity's internal control has been obtained to provide an appropriate basis for the identification and assessment of the risks of material misstatement (AU-C 402.11). If the auditor is unable to obtain a sufficient understanding from the entity, the auditor should obtain that understanding from one or more of the following procedures (AU-C 402.12):

a. obtaining and reading a type 1 or type 2 report, if available;

b. contacting the service organization, through the entity, to obtain specific information;

c. visiting the service organization and performing procedures that will provide the necessary information about the relevant controls at the service organization; or

d. using another auditor to perform procedures that will provide the necessary information about the relevant controls at the service organization.

[15]"Relevant control activities" as used in the FAM are referred to as identified controls or controls that address the risks of material misstatement at the assertion level in AU-C 315.

.11 As discussed in FAM 640.08, the auditor generally should obtain and read a type 1 or type 2 report, if available. The auditor may determine that additional procedures are necessary based on reading the report. If the auditor plans to use a type 1 or type 2 report as audit evidence to support the auditor's understanding about the design and implementation of relevant controls at the service organization, the auditor should

a. evaluate whether the type 1 report is as of a date, or in the case of a type 2 report, is for a period that is appropriate for the auditor's purposes;

b. evaluate the sufficiency and appropriateness of the evidence provided by the report for understanding the relevant controls at the service organization; and

c. determine whether complementary user entity controls identified by the service organization address the risks of material misstatement relating to the significant assertions in the entity's financial statements and, if so, obtain an understanding of whether the entity has designed and implemented such controls (AU-C 402.14).

Evaluate the Operating Effectiveness of Controls

.12 As discussed in FAM 310, OMB audit guidance requires the auditor to perform sufficient tests of internal controls that have been suitably designed and implemented to support a low level of assessed control risk. Based on AU-C 402.16, if the auditor identified relevant control activities that are designed and implemented by a service organization (see FAM 340), the auditor should obtain audit evidence about the operating effectiveness of those control activities from one or more of the following procedures:

a. obtaining and reading a type 2 report, if available;

b. performing appropriate tests of controls at the service organization; or

c. using another auditor to perform tests of controls at the service organization on behalf of the auditor.

As discussed in FAM 640.08, the auditor generally should obtain and read a type 2 report, if available. The auditor may determine that additional procedures are necessary based on reading the report.

.13 If the auditor plans to use a type 2 report as audit evidence that relevant controls at the service organization are operating effectively, the auditor should determine whether the service auditor's report provides sufficient appropriate audit evidence about the effectiveness of the controls to support the auditor's risk assessment by performing the following procedures (AU-C 402.17):

a. evaluating whether the type 2 report is for a period that is appropriate for the auditor's purposes;

b. determining whether complementary user entity controls that the service organization identified address the risks of material misstatement relating to the significant assertions in the entity's financial statements and, if so, obtaining an understanding of whether the entity has designed and implemented such controls effectively and, if so, testing their operating effectiveness;

c. evaluating the adequacy of the time period covered by the tests of controls and the time elapsed since the performance of the tests of controls; and

d. evaluating whether the tests of controls that the service auditor performed and the results thereof, as described in the service auditor's report, are relevant to the assertions in the entity's financial statements and provide sufficient appropriate audit evidence to support the auditor's risk assessment.

Audit of Internal Control over Financial Reporting

.14 As discussed in FAM 350.10, in performing an audit of internal control over financial reporting, the auditor should consider the activities of the service organization when determining the evidence required to support the auditor's opinion on the effectiveness of the entity's internal control over financial reporting. The auditor should obtain evidence that controls at the service organization that are relevant to the auditor's opinion on internal control over financial reporting are operating effectively (AU-C 940.89). If the auditor plans to use a type 2 report as audit evidence that controls are operating effectively, the auditor should perform the following:

a. Determine whether the type 2 report provides sufficient appropriate audit evidence about the effectiveness of the controls to support the auditor's opinion by evaluating

- the time period covered by the tests of controls and its relation to the date specified in management's assessment about the effectiveness of internal control over financial reporting (i.e., balance sheet date);
- the scope of the service auditor's work and the services and processes covered, the controls tested, and the tests that were performed and the way in which tested controls relate to the entity's controls; and
- the results of those tests of controls and the service auditor's opinion on the operating effectiveness of the controls (AU-C 940.04a and .90).

b. Inquire of management to determine whether management has identified any changes in the service organization's controls subsequent to the period covered by the service auditor's report. If management has identified such changes, the auditor should evaluate the effect of such changes on the effectiveness of the entity's internal control over financial reporting (AU-C 940.93).

c. Evaluate whether the results of other procedures the auditor performed indicate that there have been changes in the controls at the service organization (AU-C 940.93).

d. Determine whether to obtain additional evidence about the operating effectiveness of controls at the service organization based on (1) the procedures performed by management or the auditor and the results of those procedures and (2) an evaluation of the following risk factors (AU-C 940.06b and .94):

- the elapsed time between the time period covered by the tests of controls in the service auditor's report and the balance sheet date,
- the significance of the activities of the service organization,
- whether there are errors that have been identified in the service organization's processing, and

- the nature and significance of any changes in the service organization's controls identified by management or the auditor.

e. When a significant period of time has elapsed between the time period covered by the tests of controls in the service auditor's report and the balance sheet date, perform additional procedures to obtain sufficient appropriate audit evidence about the operating effectiveness of the controls at the service organization that are relevant to the auditor's opinion on internal control over financial reporting (AU-C 940.06b and .95).

.15 If the auditor concludes that additional evidence about the operating effectiveness of controls at the service organization is required, the auditor's additional procedures might include

a. evaluating procedures performed by management and the results of those procedures;

b. contacting the service organization, through the entity, to obtain specific information;

c. requesting that a service auditor be engaged to perform procedures that will supply the necessary information; and

d. visiting the service organization and performing such procedures (AU-C 940.A148).

Use of Subservice Organizations

.16 An entity may use a service organization that in turn uses a subservice organization to provide some of the services provided to the entity that are relevant to the entity's internal control over financial reporting. The subservice organization may be a separate entity from the service organization or may be related to the service organization.

In situations in which one or more subservice organizations are used, the interaction between the activities of the entity and those of the service organization is expanded to include the interaction between the entity, the service organization, and the subservice organizations. The degree of this interaction as well as the nature and materiality of the transactions processed by the service organization and the subservice organizations are the most important factors for the auditor to consider in determining the significance of the service organization's and subservice organization's controls to the entity's controls. (AU-C 402.A20)

.17 If a service organization uses a subservice organization, the service auditor's report may either include or exclude the subservice organization's relevant control objectives and related controls in the service organization's description of its system and in the scope of the service auditor's engagement. These two methods of reporting are known as the inclusive method and the carve-out method, respectively (AU-C 402.A42). The following describes each method (AT-C 320.08):

a. **Inclusive method.** Method of addressing the services provided by a subservice organization whereby management's description of the service organization's system includes a description of the nature of the services that the subservice organization provided as well as the subservice organization's relevant control objectives and related controls.

b. **Carve-out method.** Method of addressing the services provided by a subservice organization whereby management's description of the service organization's system identifies the nature of the services that the subservice organization performed and excludes from the description and from the scope of the service auditor's engagement the subservice organization's relevant control objectives and related controls.

.18 Based on AU-C 402.18, if the auditor plans to use a type 1 or a type 2 report that excludes the services provided by a subservice organization and those services are relevant to the audit of the entity's financial statements, the auditor should apply the requirements of FAM 640 with respect to the services provided by the subservice organization. These include obtaining an understanding of whether the subservice organization has effectively designed and implemented the relevant subservice organization controls and, if so, obtaining audit evidence about their operating effectiveness.

The nature and extent of the work to be performed by the auditor regarding the services provided by a subservice organization depend on the nature and significance of those services to the entity and the relevance of those services to the audit. The application of FAM 320.04 assists the auditor in determining the effect of the subservice organization and the nature and extent of work to be performed. (AU-C 402.A42)

640 A – Service Organization Type 2 Report Assessment Tool

A type 2 report can provide audit evidence about whether controls at a service organization were operating effectively and support the auditor's risk assessment and report on internal control over financial reporting.[16] The auditor may complete the following tool for each type 2 report prepared for a service organization that performs controls likely to be relevant to an entity's internal control over financial reporting.

If available, the auditor generally should obtain or arrange access to (1) the most recent type 2 report, (2) documentation of management's review of this report, and (3) the most recent peer review report for the service auditor that prepared this report.

Based on review of the documentation, this tool will assist the auditor in determining whether

a. the audit evidence provided by the type 2 report is sufficient and appropriate for meeting the auditor's objectives;

b. the relevant internal controls at the service organization and any relevant complementary user entity and subservice organization controls were designed, implemented, and operating effectively;

c. effective compensating controls were in place for those relevant internal controls determined to be ineffective;

d. management appropriately reviewed and documented the results of its review of the type 2 report, reached reasonable conclusions, and took appropriate actions to address any control objectives not adequately addressed in the type 2 report and any exceptions identified that have an impact on the relevant internal controls; and

e. additional procedures are needed to obtain sufficient appropriate audit evidence about the operating effectiveness of controls at the service organization or at the entity.

[16]A type 2 report consists of a report on management's description of a service organization's system and a service auditor's report on that description and on the suitability of the design and operating effectiveness of controls. Type 2 reports focus on controls likely to be relevant to entities' internal control over financial reporting, issued under AICPA's *Standards for Attestation Engagements [Clarified]* (AT-C), section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. There are other types of reports on service organizations that may be available, including reports on controls at a service organization other than those likely to be relevant to entities' internal control over financial reporting (for example, controls that are relevant to entities' compliance with specified requirements of laws, regulations, contracts, or grant agreements).

I. Name of Service Organization

ABC Service Organization

II. Description of Service Provided or Name of Financial Reporting System(s) the Service Organization Owns/Operates

ABC Service Organization processes XYZ Entity's payroll transactions. ABC Service Organization owns and operations XXX IT system to process payroll.

III. Description of Financial Statement Impact (e.g., nature of entity transactions processed, prior-year or year-to-date dollar value, transaction volume, and how it is reported in the financial statements)

Payroll transactions are recorded in "Payroll Expense" line item in the Statement of Net Cost and "Accrued Liabilities" line item on the Balance Sheet. For FY 20XX, the amount of Payroll Expense was $XXX million and the amount of Accrued Liabilities (related to payroll) was $XXX million. Transactions are recorded biweekly.

IV. Date of the Type 2 Report and the Period Covered

Report issued September XX, 20X1, covering the period October 1, 20XX, through June 30, 20X1

V. Name of the Service Auditor and Date of Most Recent Peer Review Report

IPA Public Accountants
Peer review report certified through November 30, 20XX.

VI. Audit Cycles Affected by the Service Organization

Payroll cycle and Accounts Payable cycle

VII. List of Control Activities from the Specific Control Evaluation (SCE) Worksheet That Are Being Reviewed for This Type 2 Report

SCE.1:

1a.1 Only authorized users have access to XXX IT System.

2a.2 ABC Service Organization accountant prepares a monthly reconciliation of payroll disbursements recorded in XXX IT System and the reconciliation is reviewed and approved by the ABC Service Organization manager.

VIII. Observations and Conclusions

The questions in this section are to be answered "yes," "no," or "N/A" (not applicable). For any "no" responses, provide an explanation in the space provided at the end of this assessment tool to support the auditor's assessment of the effect of the "no" response on the audit. The auditor may also use this space to explain other responses and to note additional observations.

Questions	Yes, No, N/A	Initials and date	Audit doc. references
Assess the adequacy of the standards under which the type 2 report was issued			
1) Did the auditor determine that the standards under which the report was issued are adequate? If the report states that the examination was conducted in accordance with attestation standards established by the AICPA, answer "yes." Otherwise, assess the adequacy of the standards under which the report was issued following guidance in AU-C 402.A21 and .A23.			
Assess the service auditor's independence and professional competence			
2) Did the auditor determine that the service auditor is independent of the service organization? Unless evidence to the contrary comes to the auditor's attention, a service auditor's report implies that the service auditor is independent of the service organization (note that the service auditor need not be independent of the entity). The service auditor is required to include "independent" in the title of the report. If the auditor has questions or concerns about the service auditor's independence, see FAM 615.14 for guidance.			
3) Did the auditor determine that the service auditor has the necessary competence for the auditor's purposes? If the service auditor passed a recent peer review with no deficiencies and there is no evidence indicating that the service auditor is not competent, answer "yes." If the service auditor passed a recent peer review with deficiencies or a recent peer review report is not available, assess the service auditor's competence using chapter 4 of GAGAS (2018) (Competence). See FAM 615 for guidance. If the service auditor failed its recent peer review, answer "no" and assess the effect on the audit.			
Assess the time period covered by the type 2 report			
4) If the time period of the report is not the same as the entire period of the audit, did the auditor determine whether additional procedures are needed to obtain sufficient appropriate audit evidence about the operating effectiveness of the control activities listed in section VII for the period not covered by the report?			
a) If the auditor determined that additional audit evidence is needed, did the auditor perform procedures to obtain such evidence? Additional procedures may include (a) reviewing a bridge/gap letter provided by the service organization indicating whether there have been material changes in the service organization's controls subsequent to the period covered by the type 2 report, (b) reviewing a service organization report(s) for additional time periods, or (c) testing the operating effectiveness of relevant controls at the service organization.			
5) **[For audits of internal control over financial reporting]**			

Questions	Yes, No, N/A	Initials and date	Audit doc. references
If a significant period of time has elapsed between the time period covered by the report and the balance sheet date, did the auditor perform additional procedures to obtain sufficient appropriate audit evidence about the operating effectiveness of the control activities listed in section VII as of the balance sheet date? Additional procedures may include (a) reviewing a bridge/gap letter (or equivalent), (b) reviewing a service organization report(s) for additional time periods, or (c) testing the operating effectiveness of relevant controls at the service organization.			
6) **[For audits of internal control over financial reporting]** Did the auditor inquire of management to determine whether management has identified any changes in the service organization's controls subsequent to the period covered by the report?			
a) If management identified such changes, did the auditor evaluate their effect on the auditor's assessment of the effectiveness of the control activities listed in section VII?			
7) **[For audits of internal control over financial reporting]** Did the auditor evaluate whether the results of other procedures performed by the auditor indicate that there have been changes in the service organization's controls subsequent to the period covered by the report?			
a) If the auditor identified such changes, did the auditor evaluate their effect on the auditor's assessment of the effectiveness of the control activities listed in section VII?			
Evaluate the sufficiency and appropriateness of the audit evidence provided by the type 2 report			
8) Are the control activities listed in section VII of this assessment tool included in the report?			
9) Did the auditor determine that there are no exceptions identified in the report that affect the auditor's assessment of the effectiveness of the control activities listed in section VII? If no, see step 12 below.			
10) Does the SCE worksheet include any complementary user entity and subservice organization controls identified in the report that are relevant in addressing the risks of material misstatement?			
11) Did the auditor determine that the complementary user entity and subservice organization controls identified in step 10 were designed, implemented, and operating effectively? If no, see step 12 below.			
12) If controls are determined to be ineffective in steps 9 or 11, were there effective compensating controls in place?			
13) Did the auditor determine whether the report provides sufficient appropriate audit evidence about the effectiveness of controls to support the auditor's risk assessment by: • evaluating whether the report is for a period that is appropriate for the auditor's purposes; • determining (a) whether complementary user entity controls that the service organization identified are relevant in addressing the risks of material misstatement relating to the significant assertions in the entity's financial statements and, if so, (b) whether the entity has designed, implemented, and operated such controls effectively; • evaluating the adequacy of the time period covered by the test of controls and the time elapsed since the performance of the tests of			

Questions	Yes, No, N/A	Initials and date	Audit doc. references
controls; and • evaluating whether the tests of controls that the service auditor performed and the results thereof, as described in the type 2 report, are relevant to the assertions in the entity's financial statements and provide sufficient appropriate audit evidence to support the auditor's risk assessment.			
14) **[For audits of internal control over financial reporting]** Did the auditor determine that the report provides sufficient appropriate audit evidence about the effectiveness of controls to support the auditor's opinion by evaluating the • time period covered by the tests of controls and its relation to the balance sheet date; • scope of the service auditor's work and the services and processes covered, the controls tested, and the tests that were performed and the way in which tested controls relate to the entity's controls; and • results of those tests of controls and the service auditor's opinion on the operating effectiveness of controls?			
Consider management's evaluation of the type 2 report			
15) Did management appropriately assess the report (including its timing, scope, methodology, and any exceptions identified) to determine if it provides management with reasonable assurance that the service organization controls relevant to the entity's financial reporting were operating effectively?			
a) If management determined that the report does not provide such assurance, did management perform additional procedures to obtain the assurance needed? Additional procedures may include (1) contacting the service organization to obtain specific information, (2) performing procedures at the service organization that will provide the necessary information about controls at the service organization, or (3) obtaining an additional service organization report that will provide the necessary information.			
b) Did management assess whether the complementary user entity and subservice organization controls, identified in the report and relevant to the entity's financial reporting, were operating effectively?			
16) Did management appropriately document the results of its review of the report and its assessment of the relevant complementary user entity and subservice organization controls?			
17) Are management's conclusions reasonable and materially consistent with the auditor's conclusions?			
18) Did management take appropriate actions to address any control objectives not adequately addressed in the type 2 report and any exceptions identified in the report that have an impact on the control activities listed in section VII?			

Questions	Yes, No, N/A	Initials and date	Audit doc. references
19) If any of the responses to questions 15 through 18 is "no," did the auditor determine the effect on the auditor's (a) understanding of the entity's process for assessing and reporting on the effectiveness of internal control based on criteria established under the Federal Managers' Financial Integrity Act of 1982 (FMFIA), (b) risk assessment, and (c) assessment of internal control over financial reporting (see FAM 260 and 265)?			
Determine whether sufficient appropriate audit evidence has been obtained			
20) **[For audits of internal control over financial reporting]** Based on the procedures performed by the auditor and management, the results of those procedures, and an evaluation of the risk factors listed below, did the auditor determine whether sufficient appropriate audit evidence has been obtained about the operating effectiveness of controls at the service organization to support the auditor's opinion on internal control over financial reporting? • The elapsed time between the time period covered by the tests of controls in the type 2 report and the balance sheet date. • The significance of the activities of the service organization. • Whether there are errors that have been identified in the service organization's process. • The nature and significance of any changes in the service organization's controls identified by management or the auditor. If the auditor determined that additional audit evidence is needed, see FAM 640.15 for guidance.			
Explanations for "no" responses			
Additional observations, if any			

645 – Using the Work of an Internal Auditor

Overview

.01 Certain entities employ auditors to work for entity management. These auditors may be subject to administrative direction from persons involved in the entity management process. Such audit organizations are internal auditors. FAM 645 addresses the auditor's responsibilities when using the work of internal auditors. Using the work of internal auditors includes (a) using the work of the internal audit function in obtaining audit evidence and (b) using internal auditors to provide direct assistance under the direction, supervision, and review of the auditor (AU-C 610.01).

For purposes of U.S. GAAS, the meanings of the following terms are as follows (AU-C 610.12):

- **Internal audit function** - a function of an entity that performs assurance and consulting activities designed to evaluate and improve the effectiveness of the entity's governance, risk management, and internal control processes.
- **Direct assistance** - the use of internal auditors to perform audit procedures under the direction, supervision, and review of the auditor.

.02 The auditor may be able to use the work of the internal audit function in obtaining audit evidence in a constructive and complementary manner depending on

a. the level of competency of the internal audit function;

b. whether the internal audit function's organizational status and relevant policies and procedures adequately support the objectivity of the internal auditors; and

c. whether the function applies a systematic and disciplined approach, including quality control (AU-C 610.06).

This section addresses the auditor's responsibilities when, based on the auditor's understanding of the internal audit function obtained as a result of procedures performed in accordance with FAM 220 and 260, the auditor expects to use the work of the internal audit function in obtaining audit evidence. Such use of that work modifies the nature or timing, or reduces the extent, of audit procedures to be performed directly by the auditor (AU-C 610.06).

.03 This section also addresses the auditor's responsibilities if the auditor is considering using internal auditors to provide direct assistance under the direction, supervision, and review of the auditor (AU-C 610.07).

.04 There may be individuals in an entity who perform procedures similar to those performed by an internal audit function. However, unless such procedures are performed by an objective and competent function that applies a systematic and disciplined approach, including quality control, such procedures would be considered control activities, and obtaining evidence regarding the effectiveness of such controls would be part of the auditor's responses to assessed risks in accordance with FAM 300 (AU-C 610.08).

.05 The auditor has sole responsibility for the audit opinion expressed, and that responsibility is not reduced by the auditor's use of the work of the internal audit

function in obtaining audit evidence or use of internal auditors to provide direct assistance on the engagement. Although the function may perform audit procedures similar to those performed by the auditor, neither the internal audit function nor the internal auditors are independent of the entity as is required of the auditor in an audit of financial statements in accordance with AU-C 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance With Generally Accepted Auditing Standards*. This section, therefore, defines the conditions that are necessary for the auditor to be able to use the work of internal auditors. It also defines the effort necessary to obtain sufficient appropriate evidence that the work of the internal audit function or internal auditors providing direct assistance is adequate for the purposes of the audit. The requirements are designed to provide a framework for the auditor's judgments regarding the use of the work of internal auditors to prevent overuse or undue use of such work (AU-C 610.09).

Internal Audit Function

Planning for Using the Work of the Internal Audit Function

.06 The auditor should determine whether the work of the internal audit function can be used in obtaining audit evidence by evaluating the following (AU-C 610.13):

a. The extent to which the internal audit function's organizational status and relevant policies and procedures support the objectivity of the internal auditors.

b. The level of competence of the internal audit function.

c. The internal audit function's application of a systematic and disciplined approach, including quality control. Factors that may affect this determination can include whether internal audit procedures include areas such as risk assessments, work programs, documentation, and reporting. Another factor includes whether the internal audit function has appropriate quality control requirements in standards set by relevant professional bodies for internal auditors (AU-C 610.A13).

See FAM 615 for guidance on evaluating the objectivity and competence of the internal audit function.

.07 The auditor should not use the work of the internal audit function in obtaining audit evidence if the external auditor determines that

a. the function's organizational status and relevant policies and procedures do not adequately support the objectivity of internal auditors;

b. the function lacks sufficient competence; or

c. the function does not apply a systematic and disciplined approach, including quality control (AU-C 610.14).

.08 As a basis for determining the areas and the extent to which the work of the internal audit function can be used, the auditor should consider the nature, timing, and extent of the work that has been performed, or is planned to be performed, by the internal audit function and its relevance to the auditor's overall audit strategy and audit plan (AU-C 610.15). For example, internal auditors may be performing tests of relevant controls that address a material misstatement related to the completeness of accounts payable. Alternatively, the internal

auditors may be observing physical inventories. In either case, the auditor may change the timing or scope of its own testing when using the work of internal auditors (AU-C 610.A20).

.09 The auditor should make all significant judgments in the audit engagement, including when using the work of the internal audit function in obtaining audit evidence (AU-C 610.16).

.10 To prevent undue use of the internal audit function in obtaining audit evidence, the auditor should plan to use less of the work of the function and perform more of the work directly

a. when there are greater levels of judgment involved in
   - planning and performing relevant audit procedures or
   - evaluating the audit evidence obtained;

b. the higher the assessed risk of material misstatement at the assertion level, with special consideration given to significant risks;

c. the less the internal audit function's organizational status and relevant policies and procedures adequately support the objectivity of the internal auditors; and

d. the lower the level of competence of the internal audit function (AU-C 610.17).

.11 The auditor should also evaluate whether, in aggregate, using the work of the internal audit function in obtaining audit evidence to the extent planned, together with any planned use of internal auditors to provide direct assistance, would result in the auditor still being sufficiently involved in the audit, given the auditor's sole responsibility for the audit opinion expressed (AU-C 610.18). It is not anticipated that the auditor's evaluation of using work of the internal audit function would be based on a quantitative analysis, such as percentage of hours spent by internal audit personnel in respect of the work being used by the auditor relative to total engagement hours. (AU-C 610.A23)

.12 In communicating an overview of the planned scope and timing of the audit to those charged with governance in accordance with AU-C 260, *The Auditor's Communication With Those Charged With Governance*, the auditor should communicate how the auditor has planned to use the work of the internal audit function in obtaining audit evidence (AU-C 610.19). See FAM 215 for general guidance on communicating with those charged with governance.

.13 If the auditor plans to use the work of the internal audit function in obtaining audit evidence, the auditor should discuss the planned use of the work with the internal audit function as a basis for coordinating their respective activities (AU-C 610.20).

.14 The auditor should read the reports of the internal audit function that relate to the work of the function that the auditor plans to use to obtain an understanding of the nature and extent of audit procedures the internal audit function performed and the related findings (AU-C 610.21).

Evaluating the Work of the Internal Audit Function

.15 The auditor should perform sufficient audit procedures on the body of work of the internal audit function as a whole that the auditor plans to use to determine its adequacy for purposes of the audit, including evaluating whether

a. the work of the function was properly planned, performed, supervised, reviewed, and documented;

b. sufficient appropriate evidence was obtained to enable the function to draw reasonable conclusions; and

c. conclusions reached are appropriate in the circumstances, and the reports prepared by the function are consistent with the results of the work performed (AU-C 610.22).

.16 The nature and extent of the auditor's audit procedures should respond to the auditor's evaluation of

a. the amount of judgment involved in

- planning and performing relevant audit procedures and
- evaluating the audit evidence obtained;

b. the assessed risk of material misstatement;

c. the extent to which the internal audit function's organizational status and relevant policies and procedures support the objectivity of the internal auditors; and

d. the function's level of competence (AU-C 610.23).

.17 The auditor should also reperform some of the body of work of the internal audit function that the auditor intends to use in obtaining audit evidence (AU-C 610.23). The auditor may focus this reperforming on areas where more judgment was used by the internal audit function in planning, performing, and evaluating the results of the audit procedures and in areas at higher risk of material misstatement (AU-C 610.A36).

.18 Before the conclusion of the audit, the auditor should evaluate whether the auditor's conclusions regarding the internal audit function based on FAM 645.06 and the determination of the nature and extent of use of the work of the function for purposes of the audit in FAM 645.09 through .11 remain appropriate (AU-C 610.24).

Direct Assistance

Planning for Internal Auditors to Provide Direct Assistance

.19 If the auditor plans to use internal auditors to provide direct assistance on the audit, the auditor should evaluate the existence and significance of threats to the objectivity of the internal auditors who will be providing direct assistance, as well as any safeguards applied to reduce or eliminate the threats, and the level of competence of the internal auditors who will be providing such assistance. (AU-C 610.25) See FAM 615 for guidance on evaluating the objectivity and competence of internal auditors providing direct assistance.

.20 The auditor should not use an internal auditor to provide direct assistance if

a. the internal auditor lacks the necessary objectivity to perform the proposed work or

b. the internal auditor lacks the necessary competence to perform the proposed work (AU-C 610.26).

.21 In determining the nature and extent of work that may be assigned to internal auditors providing direct assistance and the nature, timing, and extent of direction, supervision, and review that is appropriate in the circumstances, the auditor should consider

a. the auditor's evaluation of the existence and significance of threats to the internal auditors' objectivity, the effectiveness of the safeguards applied to reduce or eliminate the threats, and the level of competence of the internal auditors who will be providing such assistance;

b. the assessed risk of material misstatement; and

c. the amount of judgment involved in

- planning and performing relevant audit procedures and
- evaluating the audit evidence obtained (AU-C 610.27).

.22 Examples of work not appropriate for assigning to internal auditors providing direct assistance include fraud risk inquiries to management and the determination of unpredictable audit procedures as addressed in FAM 265 (AU-C 610.A43).

.23 The auditor should evaluate whether, in aggregate, using internal auditors to provide direct assistance to the extent planned, together with any planned use of the work of the internal audit function in obtaining audit evidence, would result in the auditor still being sufficiently involved in the audit, given the auditor's sole responsibility for the audit opinion expressed (AU-C 610.29).

.24 In communicating an overview of the planned scope and timing of the audit with those charged with governance in accordance with AU-C 260, the auditor should communicate how the auditor plans to use internal auditors to provide direct assistance (AU-C 610.28). See FAM 215 for general guidance on communicating with those charged with governance.

.25 Prior to using internal auditors to provide direct assistance, the auditor should obtain written acknowledgment from management or those charged with governance, as appropriate, that internal auditors providing direct assistance to the auditor will be allowed to follow the auditor's instructions, and that the entity will not intervene in the work the internal auditor performs for the auditor (AU-C 610.30).

.26 This written acknowledgment may be included within the audit engagement letter (or other suitable form of written agreement of the terms of engagement) or could be included in a separate document prepared by the auditor and acknowledged in writing by management or those charged with governance, as appropriate (AU-C 610.A45).

Evaluating the Use of Internal Auditors Providing Direct Assistance

.27 The auditor should direct, supervise, and review the work performed by internal auditors on the engagement in accordance with FAM 215. In so doing,

a. the nature, timing, and extent of direction, supervision, and review should be responsive to the outcome of the evaluation of the factors in FAM 645.20;

b. the auditor should instruct the internal auditors to bring accounting and auditing issues identified during the audit to the attention of the auditor; and

c. the review procedures should include the auditor testing some of the work performed by the internal auditors (AU-C 610.31).

.28 When directing, supervising, and reviewing the work performed by internal auditors, the auditor should remain alert for indications that the auditor's evaluations of internal auditors' objectivity and competence (FAM 645.19) and of the auditor's level of involvement in the audit (FAM 645.23) are no longer appropriate (AU-C 610.32).

Documentation

.29 If the auditor uses the work of the internal audit function in obtaining audit evidence, the auditor should include the following in the audit summary memorandum (AU-C 610.33):

a. the results of the evaluation of

- the function's organizational status and relevant policies and procedures to adequately support the objectivity of the internal auditors;
- the level of competence of the function; and
- the function's application of a systematic and disciplined approach, including quality control;

b. the nature and extent of the work used (including the period covered by, and the results of, such work) and the basis for that decision; and

c. the audit procedures performed by the auditor to evaluate the adequacy of the work used, including the procedures performed by the auditor to reperform some of the body of work of the internal audit function in obtaining audit evidence.

.30 If the auditor uses internal auditors to provide direct assistance on the audit, the auditor should include the following in the audit summary memorandum (AU-C 610.34):

a. the evaluation of the existence and significance of threats to the objectivity of the internal auditors, as well as any safeguards applied to reduce or eliminate the threats, and the level of competence of the internal auditors who provided direct assistance;

b. the basis for the decision regarding the nature and extent of the work performed by the internal auditors; and

c. the nature and extent of the auditor's review of the internal auditors' work (including the testing, by the auditor, of some of the work that the internal auditors performed).

The auditor should also include in the audit documentation the working papers prepared by the internal auditors who provided direct assistance on the audit engagement (AU-C 610.34).

If the auditor uses the work of the internal audit function in obtaining audit

evidence, internal auditors to provide direct assistance, or both, the auditor should include in the audit summary memorandum the auditor's evaluation of (see FAM 645.11 and .23) whether, either individually or in aggregate as applicable, using the work of the internal audit function in obtaining audit evidence and use of internal auditors to provide direct assistance resulted in the auditor still being sufficiently involved in the audit, given the auditor's sole responsibility for the audit opinion expressed (AU-C 610.35).

670 – IG Oversight of Financial Statement Audits Performed by Independent Public Accounting (IPA) Firms

.01 Except in cases where the Comptroller General performs the audit of a federal entity's financial statements,[17] for those entities with an IG, the IG has the responsibility to audit the entity's financial statements or determine that the audit will be performed by an independent public accounting (IPA) firm.[18] If an IPA firm performs the audit, the IG is responsible for overseeing and monitoring the firm to ensure compliance with generally accepted government auditing standards established by the Comptroller General of the United States (GAGAS). In addition, the IG generally should communicate written results of its oversight and monitoring to management or those charged with governance. Note that the IG's oversight is not part of the financial statement audit and does not constitute an audit performed under GAGAS.

.02 This section provides guidance to IGs for overseeing IPA firms that perform financial statement audits in their entirety to ensure that they comply with GAGAS. This guidance assists IGs in fulfilling

a. the requirement that financial statement audits for federal executive agencies and government corporations be performed in accordance with GAGAS[19] and

b. the requirement of the Inspector General Act of 1978, as amended and restated (now codified in 5 U.S.C. chapter 4), (IG Act) that the IG take appropriate steps to ensure that any work nonfederal auditors perform complies with GAGAS for audits of federal establishments, organizations, programs, activities, and functions.[20]

The guidance in this section is not to be used by a group engagement team in its assessment of the work of a component auditor or specialist (FAM 630), management's specialists (FAM 625), a service auditor (FAM 640), or an internal auditor (FAM 645).

.03 IGs should develop comprehensive policies and procedures in the following areas, as applicable, when overseeing the work of IPA firms:

a. obtaining and monitoring the services of the IPA firm;

b. determining the appropriate level of oversight of the IPA firm;

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[17]The Comptroller General may perform an executive agency's or a government corporation's financial statement audit at his or her discretion or at the request of a committee of Congress (31 U.S.C. §§ 3521(g)(3), 9105(a)(4)(C)), or as otherwise required by law.

[18]In this section, use of the terms "auditor" or "IG" refers to the individual or entity overseeing an IPA firm's work and not to a group or component auditor.

[19]31 U.S.C. §§ 3521(e)-(i), 9105. See also implementing guidance in OMB Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*, issued on July 29, 2024, which, among other things, provides that selected components of certain federal executive agencies must also have their financial statement audits performed in accordance with GAGAS. This bulletin can be found at https://www.whitehouse.gov/wp-content/uploads/2024/07/OMB-Bulletin-No.-24-02.pdf (accessed May 29, 2026). OMB audit guidance is updated periodically. Users should refer to the OMB audit guidance applicable to the current financial audit.

[20]5 U.S.C. § 404(b).

c. complying with the requirements of the IG Act, federal financial statement audit requirements, and related guidance from OMB and Treasury;

d. implementing the guidance in FAM 670 to ensure the IPA firm's compliance with GAGAS; and

e. coordinating with the group auditor (see FAM 630).

.04 When the IG determines that an IPA firm will audit its entity's financial statements, the IG may use a contracting process that is part of its organization, a procurement function within the entity to be audited, or a third party's (e.g., another government agency) procurement function. However, to fulfill its statutory responsibility, the IG plays an important role in activities leading up to and following contract award, even if the contract is awarded by a contracting office of the entity being audited or another agency. The IG generally should

a. ensure that the contract provides for full and timely access to appropriate IPA firm individuals and audit documentation for IG review;

b. coordinate closely with the contracting office to ensure a timely solicitation and award for the IPA firm's services;

c. serve as a subject matter expert in developing contract requirements, task orders if applicable, and the statement of work;

d. ensure that the contract clearly establishes the scope for a financial statement audit in accordance with GAGAS, other relevant federal requirements, and any other scope issues specific to the entity (internal control, FFMIA, etc.);

e. chair the technical evaluation panel for the acquisition, assist in selecting the members in the panel, and make a recommendation for award to the contracting officer; and

f. to the extent authorized by the contracting officer, act as the contracting officer's representative to assist in the administration of the contract, monitor technical compliance, and assist the contracting officer to ensure contractor compliance with the terms and conditions of the contract.

.05 When overseeing an audit performed by an IPA firm, the IG's considerations should include

a. evaluating the IPA firm's independence, objectivity, and competence;

b. determining the type of written communication that the IG will issue, general level of oversight to perform, and scope of review of the IPA firm's audit documentation; and

c. communicating in writing to management, those charged with governance, and other interest parties the results of the IG's oversight of the IPA firm.

.06 The IG, relevant contracting office (if different from the IG), and IPA firm generally should coordinate throughout the audit to ensure that statutory, regulatory, contractual, and other requirements related to the financial statement audit are met. The IPA firm should also provide the IG full and timely access to appropriate engagement team members and audit documentation for review (GAGAS (2018) 6.34). This may occur on an ongoing basis during the audit,

although supervisory review within the IPA firm may not have been fully completed.

The Independence, Objectivity, and Competence of the IPA Firm

.07 Before an IPA firm is awarded a contract for the audit, the IG should evaluate whether the IPA firm is independent and objective with respect to the audited entity in accordance with FAM 615. The IG should also evaluate the IPA firm's competence and capabilities to perform the audit in accordance with FAM 615.

Planning the Review of the IPA Firm's Audit Work

.08 The IG should determine the type of written communication it will issue and then develop a strategy and plan for overseeing the IPA firm's work. The strategy should be driven by a risk-based approach, which depends on the type of communication the IG plans to issue. The IG should document in an oversight plan the strategy and plan for overseeing the IPA firm's work, including the planned level of review. The IG should reevaluate the strategy and plan as the work progresses.

The table below provides the minimum level of review the IG should perform for each type of communication. The IG uses professional judgment in determining the level of review to perform. The IG may determine that additional procedures are appropriate under each type of communication.

Table 670.1: Minimum Level of Review for Each Type of Communication

Type of communication (FAM 670.23)	**Minimum level of review (FAM 670.10)**
Expresses no assurance	Low
Expresses negative assurance on the IPA firm's compliance with GAGAS	Moderate

The IG generally should also consider the extent to which the IPA firm has completed its work when determining the timing of the IG's review. Prior to the IG's review, the IPA firm should have performed at least one level of supervisory review of the evidence that supports the findings and conclusions contained in the audit report.

.09 The IG should use professional judgment in determining the appropriate level of review, considering the following factors:

a. **The type of communication the IG will issue.** More review will be necessary when the IG issues a transmittal letter expressing negative assurance on the IPA firm's compliance with GAGAS than when the IG provides no assurance (see FAM 670.23).

b. **The IPA firm's independence and objectivity (both for the audit organization and its engagement team).** The level of review increases as threats to independence and objectivity increase.

c. **The IPA firm's qualifications to perform the work (both for the audit organization and its engagement team).** The level of review increases as the IPA firm's qualifications decrease.

d. **The IG's prior experience with the IPA firm (both for its audit organization and its engagement team).** The level of review tends to decrease as the IG's confidence increases from working with the IPA firm.

e. **The materiality of line items, accounts, note disclosures, and classes of transactions.** The level of review increases as the materiality of these items increases.

f. **The risk of material misstatement due to error or fraud for the material line items, accounts, note disclosures, and classes of transactions.** The level of review increases as the risk of material misstatement increases.

.10 The extent of the IG's review of the IPA firm's audit documentation depends on the level of review determined by the IG.

a. For a **low level of review**, the IG should review, at a minimum, documentation at the entity level (e.g., key planning and completion summary documentation). This includes the audit strategy, the audit completion checklist, the audit summary memorandum, and documentation of significant findings or issues.

b. For a **moderate level of review**, the IG should review documentation at the entity level and documentation for material line items, accounts, note disclosures, and classes of transactions. This includes the audit plans, cycle summary memorandums, LIRA forms, and SCE worksheets.

For each level of review, FAM 670 A provides a summary of procedures the IG generally should perform and the documentation the IG generally should retain.

Staffing the Review of the IPA Firm's Audit Work

.11 The IG staff reviewing the audit work generally should have enough experience in financial statement auditing to understand the professional judgments that need to be made and to interact with the higher levels of the IPA firm. An assistant director or a senior manager who has significant experience in performing or reviewing financial statement audit work should supervise or perform most of the review. Less qualified staff members may perform reviews when supervised by more qualified auditors.

.12 When the IPA firm's work involves the review of IS controls, the IG should ensure that its staff have the requisite IS knowledge to review the firm's work to determine whether IS controls were adequate, audit work was properly documented, and related audit objectives were achieved.

Evaluating the Audit Work of the IPA Firm

.13 The IG should determine whether the work is sufficient and appropriate and whether the IPA firm's levels of internal review for the audit work were appropriate. In addition, the IG should determine whether any significant issues related to the audit were identified or whether substantial deviations from GAGAS, if applicable, were identified but not documented and explained in the audit. The IG should document this evaluation.

.14 Sometimes, IPA firms use methodologies or audit approaches that are different from those the IG would have used. Auditing requires a great deal of professional judgment, and there are often alternative ways to achieve audit objectives. Many IPA firms have developed, at considerable expense, proprietary audit methodologies to use on a wide range of public and private sector clients. Thus, the IG should understand the IPA firm's audit methodology and basis for the nature, timing, and extent of audit procedures. This may require obtaining permission to use proprietary software to review the audit documentation. Additionally, where the IPA firm's software is retained, the IG should develop a process to maintain the operability of the software to access the audit documentation in the future. If the IPA firm's methodology differs from the FAM, the IPA firm should discuss the matter and obtain the IG's advance approval for alternative audit methodologies, in accordance with the terms of the contract.

.15 The IG should evaluate whether sufficient appropriate evidence has been obtained to meet the audit objectives,[21] particularly for significant assertions in material line items, accounts, note disclosures, and classes of transactions with a high risk of material misstatement. If IG staff have concerns about the sufficiency of the IPA's work, the staff should discuss those concerns with the appropriate level of IG management before formally discussing them with the IPA firm. Sometimes, the IG may disagree with the IPA firm's conclusions or judgments. In such a case, the IG should evaluate the IPA firm's work as well as any other evidence or testing necessary to determine the appropriate conclusion.

After discussions with the IPA firm, if IG staff determine that sufficient appropriate evidence has not been obtained, the staff should discuss those concerns with the appropriate level of IG management and, if applicable, with appropriate contacts of a group auditor. For unresolved matters that are material to the financial statements or significantly affect the auditor's report, the IG should discuss these with management and consider how to communicate to those charged with governance the IG's concern about compliance with GAGAS. At a minimum, the IG should include in the oversight files a description of the matter giving rise to the IG's concern about the audit evidence and its potential impact on the IG's transmittal.

Documenting the Review of the IPA Firm's Audit Work

.16 There is a difference between the IG's responsibilities to review the documentation of the IPA firm and what the IG may copy and retain from that documentation. The IG generally should review the items listed in FAM 670 A, table 1.

.17 The IG uses professional judgment in deciding which of the IPA firm's documents to copy and retain. The IG's documentation generally should contain the items listed in FAM 670 A, table 2, either electronically or in hard copy. Many IPA firms use electronic technology to retain documentation for the entire audit. The IG may cite this documentation as part of the review and print any documents as necessary.

[21]Sufficiency is the measure of the quantity of evidence. Appropriateness is the measure of the quality of audit evidence, that is, its relevance and reliability in providing support for the conclusions on which the auditor's opinion is based. See AU-C 500.06.

.18 The IG may retain other documentation reviewed if it might be useful in understanding the entity, training staff members, planning future audits, reviewing the documentation, or writing the transmittal letter. Auditors often find it helpful to keep copies of documents (either electronically or in hard copy) in case questions arise during review. However, the IG may decide not to include those copies in the oversight documentation unless they are considered necessary to document the IG's review of the IPA work performed.

.19 The IG should retain oversight documents in accordance with legal requirements, but not less than 5 years from the report release date, similar to the audit documentation retention requirements of the audit standards (AU-C 230.17). In documenting the review, the IG may indicate the document number or index number that IPA firm used to locate the document at a later date.

Ownership and confidentiality of audit documentation are determined by contract and other legal requirements (see AU-C 230.A29). The IG should consult legal counsel when determining ownership of audit documentation if questions arise.

Communicating the Results of the Audit Performed by the IPA Firm

.20 For an IG overseeing an IPA firm's work, applying the guidance in FAM 670 or the oversight requirements of the IG Act and related guidance from Council of Inspectors General on Integrity and Efficiency applicable to IGs are not intended to and do not create an association for the IG with the financial statements (see AU-C 200.03).

The IG must ensure that any communication with those charged with governance, management, or other interested parties about the results of the IPA firm's audit, or the IG's oversight of the audit, does not create the appearance of the IG having applied procedures sufficient to permit the IG to (1) express an opinion on the financial statements or (2) draw conclusions on the effectiveness of internal control over financial reporting; whether financial management systems comply substantially with the three FFMIA requirements; compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements;[22] or other matters. Consequently, communication about audit and oversight results must contain a disclaimer of an opinion and should not express concurrence with the IPA firm's opinion or other conclusions. These communications generally should be made in writing.

.21 While the IG does not have an association with the financial statements, it is appropriate for the IG to transmit the IPA firm's report to the entity or other interested parties summarizing the results, providing appropriate context and disclaimers, and describing the IG's oversight procedures and results. The considerations the IG should address when deciding the type of written communication include

- the level of oversight conducted,
- resource requirements and cost-benefit considerations,

[22]In the FAM, "applicable laws, regulations, contracts, and grant agreements" refer to those laws, regulations, contracts, and grant agreements that are applicable to the audited entity.

- the timing of oversight procedures, and
- legal requirements.

.22 The IG generally should decide the type of written communication when planning the engagement. Decisions about the type and when it may communicate the results of oversight of the IPA firm's work to management and those charged with governance generally should be discussed with the IPA firm during the planning stages of the audit. The IG exercises professional judgment in making these decisions and should document the basis for the decisions. The type of communication will depend on legal requirements, as applicable, and the IG's level of review (see FAM 670.08 through .10).

.23 The IG generally should issue communication in writing. There are two possible types of transmittal letters based on the IG's oversight of the IPA firm's work—one expressing no assurance and one expressing negative assurance related to the IPA firm's compliance with GAGAS. Because the IG did not perform the audit, the IG should disclaim an opinion and should not express its concurrence with the IPA firm's opinion or other conclusions. The IG may also expand the letter to highlight audit findings or information or to describe oversight procedures that the IG performed. See examples in FAM 670 B for wording for the two types of transmittal letters.

a. **Express no assurance.** For this communication, the IG issues a transmittal based on procedures described in FAM 670 A for a low level of review. In these situations, the transmittal should not discuss any procedures performed as part of the low level of review, to avoid the appearance that any assurance is given.

b. **Express negative assurance on compliance with GAGAS.** This communication indicates that the IG reviewed the IPA firm's report and related audit documentation, inquired of its representatives, and found no instances where the IPA firm did not comply, in all material respects, with GAGAS.

670 A – Summary of Procedures and Documentation for IG Oversight of Financial Statement Audits Performed by IPA Firms

.01 Table 1 presents a summary of procedures the IG generally should perform for each level of review (i.e., moderate or low) when overseeing an audit performed by an IPA firm. As discussed in FAM 670.09, the IG uses professional judgment in determining the appropriate level of review.

Table 2 presents a summary of documentation the IG generally should retain from the review of the IPA firm's work. However, the summary does not include procedures to determine the IPA firm's independence, objectivity, and competence (see FAM 670.07). Where the IPA firm uses equivalent documents, the IG should review those documents.

Table 1: Summary of Procedures for IG Oversight of Financial Statement Audits Performed by IPA Firms

PROCEDURES	
Low and Moderate Levels of Review (at entity level)	**Moderate Level of Review** (for material line items, accounts, note disclosures, and classes of transactions)
1. Communicate with the independent public accounting (IPA) firm • as to the objectives of the work • through discussions of their procedures and results • by attending key meetings (e.g., entrance and exit conferences) 2. Review the following: • audit strategy, including materiality determinations, risk assessments, and preliminary analytical procedures (FAM 290.07) • identification of, and results of tests for compliance with, significant provisions of applicable laws, regulations, contracts, and grant agreements (FAM 245, 460) • summary of uncorrected misstatements (FAM 540, 595 C) • audit exposure evaluation (FAM 545) • audit summary memorandum (FAM 590.07) • significant findings or issues; conclusions reached thereon; and significant judgments made in reaching those conclusions (FAM 590.07) • overall analytical procedures (FAM 590.08) • management representation letter (FAM 1001) • legal counsel response (FAM 1002) • audit completion checklist (FAM 1003) 3. Read the following (FAM 580): • the IPA firm's audit report and management's response • entity financial statements and notes, required supplementary information, and other information • if applicable, separately issued reports that provide additional information on findings and recommendations	1. Review the following: • audit plans (FAM 290.10) • cycle memorandums (FAM 390.06) • assessment of information system controls (FAM 390.10) • line item risk analysis (LIRA) forms (FAM 395 H) • specific control evaluation (SCE) worksheets (FAM 395 G) • sampling plans, including tolerable misstatement, and evaluation of sample results (FAM 490.06) • documentation detailing the auditor's response to significant risks (FAM 470.03) • cycle summary memorandums on the results of procedures performed (FAM 490.01c) • written communications on findings (e.g., notifications of findings and recommendations) (FAM 550.20)

Table 2: Summary of Documentation for IG Oversight of Financial Statement Audits Performed by IPA Firms

DOCUMENTATION
Low and Moderate Levels of Review
1. IG-prepared: • oversight plan • results of review • key meetings (e.g., entrance and exit conferences) 2. Independent public accounting (IPA) firm prepared: • audit strategy • summary of uncorrected misstatements • audit exposure evaluation • audit summary memorandum • significant findings or issues; conclusions reached thereon; and significant judgments made in reaching those conclusions • audit completion checklist • IPA firm's audit report and management's response • entity financial statements and notes, required supplementary information, and other information • if applicable, separately issued reports that provide additional information on findings and recommendations

670 B – Example Transmittal Letter for IG Oversight of Financial Statement Audits Performed by IPA Firms

.01 As discussed in FAM 670.23, the IG issues one of two types of communication depending on the IG's level of review of the IPA firm's work—one expressing no assurance and one expressing negative assurance on the IPA firm's compliance with GAGAS. Below is an example transmittal letter in which an IPA firm performed a financial statement audit and the IG either expresses no assurance or expresses negative assurance on the IPA firm's compliance with GAGAS.

Example Transmittal Letter for IGs Expressing No Assurance or Negative Assurance on an IPA Firm's Compliance with GAGAS

To **[appropriate addressee]**

The independent public accounting firm of **[IPA firm]** was awarded a contract to audit the financial statements of **[entity]** as of and for the fiscal years ended **[September 30, 20XX, and 20XX]**; provide an opinion **[or report]** on internal control over financial reporting; report on compliance with laws, regulations, contracts, and grant agreements; and provide an opinion on whether **[entity's]** financial management systems complied substantially[23] with the requirements of the Federal Financial Management Improvement Act of 1996 (FFMIA).[24] The contract required that the audit be performed in accordance with U.S. generally accepted government auditing standards, Office of Management and Budget audit guidance, and the GAO/CIGIE *Financial Audit Manual* **[if required by the contract]**.

In its audit of **[entity]**, **[IPA firm]** reported

- the financial statements are presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles;
- **[entity]** maintained, in all material respects, effective internal control over financial reporting;[25]
- **[entity's]** financial management systems complied substantially with the requirements of FFMIA;[26] and
- no reportable noncompliance with provisions of applicable laws, regulations, contracts, and grant agreements tested.

[IPA firm] also described the following significant matters **[if any]**:

- **[Discuss any significant matters]**

[For transmittal letters expressing no assurance, use the following paragraph.]

[IPA firm] is responsible for the attached auditor's report dated **[date]** and the conclusions expressed therein. We do not express opinions on **[entity's]** financial statements, internal control over financial reporting, or whether **[entity's]** financial management systems complied substantially with the three requirements of FFMIA; or conclusions on compliance.

[For transmittal letters expressing negative assurance on an IPA firm's compliance with GAGAS, use the following paragraph.]

In connection with the contract, we reviewed **[IPA firm's]** report and related documentation and inquired of its representatives. Our review, as differentiated from an audit of the financial

[23]If the IPA firm did not provide an opinion (i.e., did not give positive assurance) on whether the entity's systems complied substantially with the three FFMIA requirements, change this to "to report on whether [**entity's**] financial management systems did not comply substantially" (negative assurance).

[24]For non-Chief Financial Officers Act of 1990 agencies, delete references to FFMIA in this paragraph and in the bullet below.

[25]If the IPA firm did not provide an opinion on internal control over financial reporting, change this to "no material weaknesses in internal control over financial reporting" (and include a definition of material weakness in a footnote).

[26]If the IPA firm did not provide an opinion (i.e., did not give positive assurance) on whether the entity's systems complied substantially with the three FFMIA requirements, change this to "no instances in which **[entity's]** financial management systems did not comply substantially with the requirements of FFMIA" (negative assurance).

statements in accordance with U.S. generally accepted government auditing standards, was not intended to enable us to express, and we do not express, opinions on **[entity's]** financial statements, internal control over financial reporting,[27] or whether **[entity's]** financial management systems complied substantially with the three FFMIA requirements,[28] or conclusions on compliance. **[IPA firm]** is responsible for the attached auditor's report dated **[date]** and the conclusions expressed therein. However, our review disclosed no instances where **[IPA firm]** did not comply, in all material respects, with U.S. generally accepted government auditing standards.[29]

[27]If the IPA firm did not provide an opinion on internal control over financial reporting, change this to "conclusions about the effectiveness of internal control over financial reporting."

[28]If the IPA firm did not provide an opinion on FFMIA, change "opinion" to "conclusions."

[29]If the auditor found that the IPA firm did not comply with GAGAS, or if the auditor disagrees with the IPA firm's conclusions, see FAM 670.15.

SECTION 700

FFMIA Guidance and Agreed-Upon Procedures Guidance

Contents of FFMIA Guidance and Agreed-Upon Procedures Guidance

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701 – Assessing Financial Management Systems' Compliance under the Federal Financial Management Improvement Act of 1996 (FFMIA)

.01 FFMIA section 803(a) requires the 24 Chief Financial Officers Act of 1990 (CFO Act) agencies to implement and maintain financial management systems that comply substantially with

a. federal financial management systems requirements,

b. applicable federal accounting standards, and

c. the *U.S. Standard General Ledger* (USSGL) at the transaction level.

.02 The law also requires the heads of CFO Act agencies and the auditors of their financial statements to report annually on whether agency financial management systems complied substantially with these three requirements.

.03 The current guidance for federal financial management systems is Office of Management and Budget (OMB) Circular No. A-123, appendix D, *Management of Financial Management Systems – Risk and Compliance*. OMB Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*,[1] provides additional information regarding FFMIA audit requirements.

.04 This section provides guidance to help the auditor determine whether the agency's financial management systems comply substantially with FFMIA section 803(a) requirements. It provides definitions, explains the requirements, and discusses related guidance as well as audit issues related to testing for such compliance. An example audit plan is included in FAM 701 A.

FFMIA Definitions

.05 FFMIA includes the following definitions:

a. Financial management systems include the financial systems and the financial portions of mixed systems necessary to support financial management, including automated and manual processes, procedures, controls, data, hardware, software, and support personnel dedicated to the operation and maintenance of system functions.[2]

b. Financial system includes an information system, comprised of one or more applications, that is used for

- collecting, processing, maintaining, transmitting, or reporting data about financial events;

[1]This bulletin, issued on July 29, 2024, can be found at https://www.whitehouse.gov/wp-content/uploads/2024/07/OMB-Bulletin-No.-24-02.pdf (accessed May 29, 2026). OMB audit guidance is updated periodically. Users should refer to the OMB audit guidance applicable to the current financial audit.

[2]This definition is from the Federal Financial Management Improvement Act of 1996, Pub. L. No. 104-208, div. A., § 101(f), title VIII, 110 Stat. 3009, 3009-389 (Sept. 30, 1996), which is reprinted in 31 U.S.C. § 3512 note. OMB Circular No. A-123, appendix D, defines a federal financial management system as the organized collection of software, hardware, processes, procedures, and controls necessary to inform and support the core financial systems; including systems necessary to achieve financial management, operational, performance, and reporting objectives.

- supporting financial planning or budgeting activities;
- accumulating and reporting costs information; or
- supporting the preparation of financial statements.[3]

c. A mixed system is an information system that supports both financial and nonfinancial functions of the federal government or components thereof.

FFMIA System Requirements (FFMIA Section 803(a))

.06 The first FFMIA system requirement is the implementation and maintenance of financial management systems that comply substantially with federal financial management systems requirements. The Department of the Treasury develops and maintains, in coordination with OMB and federal agencies, federal financial management systems requirements. *Revised Federal Financial Management System Requirements for Fiscal Reporting* is published in the *Treasury Financial Manual* (TFM), volume I, part 6, chapter 9500.[4] Federal financial management systems requirements (FFMSR) are currently published as part of the Financial Management Capability Framework (FMCF). Specifically, the FFMSRs comprise the business capabilities component of the FMCF. FFMSRs are presented as business capability statements, which are organized by FFMSR goal groups aligned with the federal financial management goals from the FFMIA Compliance Determination Framework included in OMB Circular No. A-123, appendix D. FFMSRs apply to financial systems as well as administrative systems and programmatic systems that support financial management business outcomes (i.e., mixed systems).

.07 The second FFMIA system requirement is the implementation and maintenance of financial management systems that comply substantially with applicable federal accounting standards. The Federal Accounting Standards Advisory Board (FASAB) promulgates federal accounting standards after considering the financial and budgetary information needs of Congress, executive agencies, and other users of federal financial information, as well as comments from the public.[5] FAM 560 describes the relationship of the FASAB standards to the hierarchy of U.S. generally accepted accounting principles (U.S. GAAP). The FFMSRs incorporate applicable federal accounting standards by including authoritative references to FASAB standards. Each business capability statement within the FFMSRs is linked to authoritative references, including applicable Statements of Federal Financial Accounting Concepts (SFFAC) and Statements of Federal Financial Accounting Standards (SFFAS).

.08 The third FFMIA system requirement is the implementation and maintenance of financial management systems that comply substantially with the USSGL at the transaction level. The USSGL provides a uniform chart of accounts and guidance

[3]OMB Circular No. A-123, appendix D, states that "financial system" is synonymous with "core financial system" and consists of six functional areas: general ledger management, funds management, payment management, receivable management, cost management, and reporting.

[4]Federal financial management systems requirements, as revised, can be found at https://tfx.treasury.gov/tfm/volume1/part6/chapter-9500-revised-federal-financial-management-system-requirements-fiscal (accessed May 29, 2026).

[5]FASAB standards can be found at https://fasab.gov/ (accessed May 29, 2026).

for standardizing federal agency accounting and supports the preparation of standard external reports required by OMB and Treasury. The USSGL is defined in the latest supplement, which is released annually in Treasury's TFM.[6] The supplement is composed of the following major sections:

- chart of accounts,
- accounts and definitions,
- account transactions,
- USSGL account attributes,
- crosswalks to standard external reports and reclassified statements, and
- Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS) validations and edits.[7]

The FFMSRs incorporate USSGL requirements by including authoritative references. Each business capability statement within the FFMSRs is linked to authoritative references, including applicable USSGL sections.

Management's FFMIA Reporting Requirements (FFMIA Section 803(c))

.09 CFO Act agencies are required to determine whether their financial management systems comply substantially with the three FFMIA requirements.

.10 If an agency determines that its financial management systems do not comply substantially with the three FFMIA requirements, the agency is required to establish a remediation plan.

.11 OMB Circular No. A-136, *Financial Reporting Requirements*,[8] specifies that the Analysis of Systems, Controls, and Legal Compliance section of management's discussion and analysis, as included in the agency's annual report containing the audited financial statements and the auditor's report, includes

a. a summary of the agency's financial management systems, including systems critical to financial reporting and financial control; and

b. a summary of the agency's financial management systems improvement strategy.

.12 OMB Circular No. A-136 also requires agencies to provide, in a single statement or two separate statements signed by the agency head, management assurances related to the Federal Managers' Financial Integrity Act of 1982 (FMFIA) and FFMIA. The assurances must be provided in a single report in the agency financial report, performance and accountability report, or other management report labeled "Analysis of Entity's Systems, Controls, and Legal Compliance." The assurances may, but are not required to, be included in management's discussion and analysis. If not included in management's discussion and analysis, the assurances must be provided (1) elsewhere in the

[6]The USSGL can be found at https://tfx.treasury.gov/tfm/supplements/ussgl (accessed May 29, 2026).

[7]GTAS is used by agencies to provide proprietary financial reporting information and information about budget execution to Treasury.

[8]OMB reporting guidance in OMB Circular No. A-136, *Financial Reporting Requirements*, is updated annually. Users should refer to the OMB reporting guidance applicable to the current financial audit.

agency financial report or performance and accountability report, or (2) in another report management provides to the President and Congress.[9]

Auditor's FFMIA Reporting Requirements (FFMIA Section 803(b))

.13 Auditors of CFO Act agencies are required to report whether the agency financial management systems comply substantially with the three FFMIA requirements. OMB Bulletin No. 24-02, *Audit Requirements for Federal Financial Statements*, refers auditors to OMB Circular No. A-123, appendix D, for guidance on assessing a CFO Act agency's compliance with FFMIA.

.14 When an auditor of a CFO Act agency reports that the agency financial management systems do not comply substantially with the three FFMIA requirements, the auditor is required to include the following in the report:

a. The entity or organization responsible for the financial management systems that have been found to not comply substantially with the three FFMIA requirements.

b. All facts pertaining to the failure to comply substantially with the three FFMIA requirements, including

- the nature and extent of the noncompliance, including areas in which there is substantial but not full compliance;
- the primary reason or cause of the noncompliance;
- the entity or organization responsible for the noncompliance; and
- any relevant comments from any responsible officer or employee.

c. A statement with respect to the recommended remedial actions and the time frames for implementing such actions.

See FAM 580.87–.91.

OMB Guidance

.15 OMB Circular No. A-123, appendix D, provides the FFMIA Compliance Determination Framework that CFO Act agencies should use (and the auditor may use) in determining whether the agency's financial management systems comply substantially with the three FFMIA requirements. The FFMIA Compliance Determination Framework identifies federal financial management goals grouped into the following two categories: (1) federal financial information management and reporting and (2) financial management and internal controls. The federal financial management goals within these two categories are aligned with the FFMSR goal groups and corresponding business capability statements presented in the FFMSRs. See the *Revised Federal Financial Management System Requirements for Fiscal Reporting* published in the TFM, volume I, part 6, chapter 9500, for more information on the FFMSRs.

.16 OMB Circular No. A-123, appendix D, requires agencies to use the FFMIA Compliance Determination Framework to provide documentation of the evidence

[9]In addition, SFFAS 64, paragraph 13, requires the management's discussion and analysis to provide management's summary assessment of the effectiveness of the entity's financial management systems and to address systems deficiencies.

utilized in determining whether the agency's financial management systems comply substantially with the three FFMIA requirements. Appendix D also requires agencies to develop a risk-based approach with documented methods to determine whether financial management systems comply substantially with the three FFMIA requirements. For agencies using service providers for financial management systems, documented methods may include the use of service organization reports, ongoing monitoring, separate evaluations, or a combination thereof. Appendix D specifies that agencies provide documentation of the evidence relied on when determining whether the agency's financial management systems comply substantially with the three FFMIA requirements. Appendix D also specifies that agency documentation must include an explanation for any noncompliant system presenting increased risks to accomplishing the agency's mission.

Audit Procedures

.17 To meet FFMIA's reporting requirements, the auditor should plan audit procedures sufficient to enable the auditor to determine the degree to which the agency's financial management systems comply with the three FFMIA requirements and whether that degree of compliance is substantial.

.18 FAM 701 A provides an example audit plan to assist the auditor in determining whether the agency's financial management systems comply substantially with the three FFMIA requirements. This example audit plan provides audit procedures intended to satisfy the audit requirements below. The auditor may tailor the audit procedures to satisfy the objectives or intent of each step. The auditor may use evidence obtained through performing other audit procedures (e.g., in connection with control and substantive tests performed in a financial statement audit) to satisfy the audit procedures presented in FAM 701 A. However, certain audit procedures may require collecting evidence not normally obtained in a financial statement audit (e.g., audit procedures related to general ledger setup and maintenance to determine whether proprietary and budgetary account attributes are consistent with the USSGL).

.19 The auditor should obtain an understanding of the agency's financial management systems. In doing so, the auditor should read management's most recent summaries of the agency's financial management systems and financial management systems improvement strategy, as well as management assurances related to FMFIA and FFMIA. Obtaining an understanding of the agency's financial management systems is efficiently accomplished, for the most part, in conjunction with the audit procedures performed to understand the entity's significant business process applications and significant manual processes during the planning and internal control phases of the audit. Financial management systems covered by FFMIA may also include those that support financial planning; management reporting; budgeting; cost accumulation; and other business processes, such as benefit payments, logistics, personnel management, and acquisition. The auditor should identify any financial management systems covered by FFMIA that are not involved in processing financial transactions or preparing financial statements. These systems may require special consideration when assessing compliance with FFMIA as they may not otherwise be evaluated as part of the financial statement audit.

.20 The auditor should obtain an understanding of the status of any corrective actions planned or under way to address previously identified instances in which

the agency's financial management systems do not comply substantially with FFMIA requirements or internal control weaknesses related to these systems. See FAM 220.18 through .20 for more information on sources of the auditor's understanding.

Deficiencies identified in Federal Information Security Modernization Act of 2014 (FISMA) reports could indicate that the agency is unable to minimize federal financial management systems' security risks to an acceptable level. For considerations related to FISMA, see the FISMA subsection in FAM 260.

.21 The auditor should obtain an understanding of management's process for determining whether the agency's financial management systems comply substantially with the three FFMIA requirements, including any compliance indicators management used. OMB Circular No. A-123, appendix D, identifies financial statement audit results, as well as risk management and internal control reviews performed in connection with OMB Circular No. A-123, appendix A, *Management of Reporting and Data Integrity Risk*, as compliance indicators. However, management may identify other compliance indicators. The auditor should read any management-developed documentation to determine whether the agency's financial management systems comply substantially with the three FFMIA requirements, including management's risk-based approach with documented methods.

.22 The auditor should perform audit procedures sufficient to determine whether the agency's financial management systems comply substantially with the three FFMIA requirements. The auditor may use management's documentation as the basis for tests of compliance with FFMIA. If management is unable to provide documentation, the auditor should ask for the reasons why and how management has determined whether the agency's financial management systems comply substantially with the three FFMIA requirements. A lack of documentation may indicate that the agency's financial management systems do not comply substantially with the three FFMIA requirements.

.23 The auditor may limit the scope of work performed to support the FFMIA assessment with respect to those requirements for which there is sufficient evidence that the agency's financial management systems do not comply substantially with the three FFMIA requirements (e.g., continuation of previously reported instances of such noncompliance). When limiting the scope of work performed, the auditor may obtain sufficient information to describe instances in which systems do not comply substantially with the three FFMIA requirements and recommend remedial actions, as required by FFMIA, by (1) obtaining an understanding of the design of the financial management systems and related controls, (2) performing control and substantive testing as part of the financial statement audit, and (3) reading management-developed documentation about whether financial management systems comply substantially with the three FFMIA requirements. However, the auditor may determine that additional evidence is needed to convince management that the agency's financial management systems do not comply substantially with the three FFMIA requirements. In such cases, the auditor generally should perform the testing needed to gather sufficient evidence to demonstrate this.

.24 The auditor should document conclusions regarding whether

a. the agency's financial management systems comply substantially with the three FFMIA requirements;

b. management's process for determining whether the agency's financial management systems comply substantially with the three FFMIA requirements is designed, implemented, and operating effectively to produce sufficient evidence for management's conclusions; and

c. management's conclusions are adequately supported.

.25 If one or more of the agency's financial management systems do not comply substantially with one or more of the three FFMIA requirements, the auditor should prepare the FFMIA section of the audit report to include all required elements. See FAM 701.13 through .14 and FAM 580.87 through .91.

701 A – Example Audit Plan for Assessing Financial Management Systems' Compliance under FFMIA

Agency _____

Date of review _____

Job code _____

Objective: Section 803(a) of the Federal Financial Management Improvement Act of 1996 (FFMIA) requires the 24 agencies covered by the Chief Financial Officers Act of 1990 (CFO Act) to implement and maintain financial management systems that comply substantially with (1) federal financial management systems requirements, (2) applicable federal accounting standards, and (3) the *U.S. Standard General Ledger* (USSGL) at the transaction level (i.e., the three FFMIA requirements).

The objective of these audit procedures is to assist the auditor in (1) assessing whether a CFO Act agency's financial management systems comply substantially with the three FFMIA requirements and (2) satisfying the auditor's reporting requirements under FFMIA Section 803(b).

Procedure	Initials/ date	Doc. ref.
I. Planning		
A. Inspect relevant documentation to obtain an understanding of the agency's financial management systems, as well as any instances in which the systems do not comply substantially with the three FFMIA requirements or internal control weaknesses identified in the prior year. FAM 220.18 identifies sources of information from which the auditor may obtain information about the agency, including the agency's prior annual report (performance and accountability report, agency financial report, or annual management report); management or auditor reports on the agency's compliance with FFMIA; inspector general and internal audit reports; service organization reports; and GAO reports.		
B. Through inquiry and inspection of relevant documentation, identify any financial management systems covered by FFMIA that are not involved in processing financial transactions or preparing financial statements. These systems may require special consideration when the auditor assesses whether they comply substantially with the three FFMIA requirements, as they may not otherwise be evaluated as part of the financial statement audit.		
C. Through inquiry and inspection of relevant documentation, obtain an understanding of the status of any corrective actions planned or under way to address previously identified instances in which the agency's financial management		

Procedure	Initials/ date	Doc. ref.
systems do not comply substantially with the three FFMIA requirements or internal control weaknesses related to these systems. FAM 280.12 requires auditors to ask entity management to identify previous audits, attestation engagements, and other studies that directly relate to the objectives of the audit, including whether related recommendations have been implemented. Relevant documentation may include remediation plans for bringing the agency's financial management systems into substantial compliance with FFMIA, if applicable.		
D. Through inquiry and inspection of relevant documentation, obtain an understanding of management's process for determining whether the agency's financial management systems comply substantially with the three FFMIA requirements. Relevant documentation may include • policies and procedures detailing management's risk-based approach for assessing compliance with FFMIA, including any compliance indicators management used,[10] and • the FFMIA Compliance Determination Framework, as completed by management in the prior year's assessment.		
II. Testing		
A. Perform tests to assess whether the agency's financial management systems comply substantially with the three FFMIA requirements. If planning to use management's documentation as the basis for tests of compliance with FFMIA, consider whether management's process for determining whether the agency's financial management systems comply substantially with the three FFMIA requirements is (1) consistent with the guidance set forth in Office of Management and Budget (OMB) Circular No. A-123, appendix D, *Management of Financial Management Systems – Risk and Compliance*, and (2) likely to produce sufficient evidence for management's conclusions.		
1. Inspect system documentation or other management-developed evidence to demonstrate whether the agency's financial management systems satisfy federal financial management systems requirements (FFMSR). If		

[10]OMB Circular No. A-123, appendix D*, Management of Financial Management Systems – Risk and Compliance*, requires agencies to develop a risk-based approach with documented methods to determine if financial management systems comply substantially with FFMIA requirements.

Procedure	Initials/ date	Doc. ref.
management's documentation is inadequate or does not exist, perform tests to determine whether the agency's financial management systems satisfy the FFMSRs. To the extent possible, coordinate such tests with control and substantive tests performed as part of the financial statement audit. 2. For agencies using service providers for financial management systems, inspect the results of management's documented methods of assessment, which may include the use of service organization reports, ongoing monitoring, separate evaluations, or a combination thereof. If management's documentation is inadequate or does not exist, perform tests to determine whether the financial management systems operated or maintained by the agency's service organization satisfy FFMSRs (e.g., inspect system documentation or other evidence developed by the agency's service organizations). To the extent possible, coordinate such tests with control and substantive tests performed as part of the financial statement audit. 3. Inquire about changes to the agency's financial management systems, including any new functionality. If applicable, determine whether such changes have been incorporated into the system documentation or other management-developed evidence or the agency's service organizations to demonstrate that the systems satisfy FFMSRs. 4. Inspect the FFMIA Compliance Determination Framework completed by management in the current year's assessment. 5. Determine whether the agency's financial management systems use financial data that can be traced directly to USSGL accounts to produce reports providing financial information for both internal and external reporting. a. If available, inspect the agency-developed crosswalk from its chart of accounts for the financial system to the USSGL. Perform tests to determine the accuracy of the crosswalk. i. Trace all USSGL accounts to the crosswalk. ii. Identify any USSGL accounts that are not included in the crosswalk. Identify any agency accounts not associated with a USSGL account in the crosswalk.		

Procedure	Initials/ date	Doc. ref.
b. If an agency-developed crosswalk is not available, compare the chart of accounts for the agency's financial system to the USSGL chart of accounts and follow up on any exceptions. c. Compare the financial system's posting rules to those included in the USSGL to determine whether they conform to the USSGL. 6. Perform additional audit procedures, as appropriate, to obtain sufficient evidence to determine whether the agency's financial management systems comply substantially with the three FFMIA requirements. For example, the auditor may determine that additional evidence is needed to assess systems covered by FFMIA that are not involved in processing financial transactions or preparing financial statements.		
B. Summarize results to determine whether the agency's financial management systems comply substantially with the three FFMIA requirements. Where applicable, include the results of other audit procedures performed as part of the financial statement audit.		
1. Consider the results of the tests performed to assess whether the agency's financial management systems comply substantially with the three FFMIA requirements. See step II.A above.		
2. Consider whether the agency's financial management systems maintain accounting data to permit the preparation of financial statements in accordance with U.S. GAAP. Inspect documentation that the financial statement audit team prepared to summarize uncorrected misstatements; summarize corrected misstatements; communicate misstatements to management and those charged with governance; and conclude on whether uncorrected misstatements are material, individually or in the aggregate. Inspect the Federal Financial Reporting Checklist prepared by the financial statement audit team and management, if applicable.		
3. Consider internal control weaknesses identified during the financial statement audit. Inspect documentation prepared by the financial statement audit team to summarize and classify internal control weaknesses identified during the financial statement audit as material weaknesses, significant deficiencies, or other control deficiencies. Such documentation should include any weaknesses identified through the performance of the		

Procedure	Initials/ date	Doc. ref.
audit procedures in step II.A above. Consider the nature and severity of the internal control weaknesses identified during the financial statement audit and whether they constitute instances in which the agency's financial management systems do not comply substantially with the three FFMIA requirements.		
4. Consider whether the evidence obtained during the financial statement audit demonstrates that the agency's financial management systems include effective internal controls. Effective internal controls provide reasonable assurance that (1) transactions are properly recorded, processed, and summarized to permit the preparation of the financial statements in accordance with U.S. generally accepted accounting principles, and assets are safeguarded against loss from unauthorized acquisition, use, or disposition, and (2) transactions are executed in accordance with provisions of applicable laws, regulations, contracts, and grant agreements, noncompliance with which could have a material effect on the financial statements.		
5. Consider whether the evidence obtained during the financial statement audit demonstrates that the agency's financial management systems enable the agency to prepare, execute, and report on its budget in accordance with the requirements of OMB Circular No. A-11, *Preparation, Submission and Execution of the Budget*.		
6. Consider whether the evidence obtained during the financial statement audit demonstrates that the agency's financial management systems enable the agency to prepare financial management information in accordance with the requirements of OMB Circular No. A-136, *Financial Reporting Requirements*, and align with agency strategic goals and performance information.		
7. Consider the effect of any additional evidence obtained in step II.A.6 above on the auditor's assessment of whether the agency's financial management systems comply substantially with the three FFMIA requirements.		
III. Reporting		
A. Document conclusions regarding whether 1. the agency's financial management systems comply substantially with the three FFMIA requirements; 2. management's process for determining whether the agency's financial management systems comply		

Procedure	Initials/ date	Doc. ref.
substantially with these requirements is designed, implemented, and operating effectively to produce sufficient evidence for management's conclusions; and 3. management's conclusions are adequately supported.		
B. If one or more of the agency's financial management systems do not comply substantially with one or more of the three FFMIA requirements, perform the following: 1. Document the entity or organization responsible for the financial management systems that have been found to not comply substantially with the three FFMIA requirements. 2. Document all facts pertaining to the failure to comply substantially with the three FFMIA requirements, including a. the nature and extent of the noncompliance, including areas in which there is substantial but not full compliance; b. the primary reason or cause of the noncompliance; c. the entity or organization responsible for the noncompliance; and d. any relevant comments from any responsible officer or employee. 3. Develop a statement with respect to the recommended remedial actions and the time frames for implementing such actions for inclusion in the auditor's report.		
C. Read the agency's management representation letter and management's discussion and analysis covering the year under audit to obtain agency management's FFMIA determination.		
D. Prepare the FFMIA section of the audit report. See FAM 580.87 through .91 for guidance.		

710 – Agreed-Upon Procedures

.01 In an agreed-upon procedures engagement, the auditor performs specific procedures on a subject matter and reports on the results to assist the intended users in evaluating the subject matter. Agreed-upon procedures should be performed in accordance with GAGAS, which incorporate the AICPA's financial audit and attestation standards. AT-C 105, *Concepts Common to All Attestation Engagements*, applies to all attestation engagements. AT-C 215, *Agreed-Upon Procedures Engagements*, contains performance and reporting requirements and application guidance specific to agreed-upon procedures engagements. When performing an agreed-upon procedures engagement, the auditor should comply with AT-C 105, AT-C 215, and any subject-matter AT-C section relevant to the engagement when the AT-C section is in effect and the circumstances addressed by the AT-C section exist (AT-C 105.14).

.02 The auditor may perform an agreed-upon procedures engagement on a variety of subject matters.[11] The engagement will vary depending on the needs of the engaging party. Examples of agreed-upon procedures include the following:

a. Compare payroll information reported to the Office of Personnel Management with the entity's payroll records and general ledger (refer to OMB audit guidance for additional information).

b. Compare entity reconciliations of intragovernmental activity and balances with supporting documentation and compare amounts with the financial statements and with reports to Treasury (refer to OMB audit guidance for additional information).

c. Trace tax collections from the master file to deposit confirmations and determine whether they were recorded in the appropriate period and in the correct tax class.

d. Trace amounts on the entity's financial statements to an account grouping worksheet, foot the worksheet, read the chief financial officer's (CFO) explanation for any differences, and compare the explanation with supporting documentation.

e. Examine official receipt documents to determine whether they were included in the weekly deposit and compare deposit amounts to amounts reported on the statement of funding.

f. Inspect vendor invoices and related payment documentation to determine whether payment was made within 30 days.

.03 Parties involved in agreed-upon procedures engagements include

a. the engaging party, which is the party that engages the auditor to perform the attestation engagement;

b. the responsible party, which is the party responsible for the underlying subject matter (which can be the same as the engaging party);

c. the intended user(s) (which can be the same as the engaging party); and

[11]The "practitioner" as used in AT-C 215 is referred to as the auditor in the FAM.

d. the auditor.

All parties should clearly understand the procedures to be applied. The nature, timing, and extent of agreed-upon procedures depend on the needs of the engaging party. Although the auditor may assist the engaging party in designing the procedures, the engaging party assumes responsibility for the appropriateness of the design and extent of the procedures.

.04 The auditor should establish that the preconditions for an agreed-upon procedures engagement are present in accordance with AT-C 215.10 through .13. The auditor should also agree upon the terms of the engagement with the engaging party. The agreed-upon terms of the engagement should be specified in sufficient detail in an engagement letter, an example of which is provided in FAM 710 A, or other suitable form of written agreement. (AT-C 215.14) The agreed-upon terms of the engagement should include the following (AT-C 215.15):

a. The nature of the engagement established pursuant to AT-C 215.12.

b. Identification of the subject matter and responsible party.

c. The responsibilities of the auditor.

d. A statement that the engagement will be conducted in accordance with the AICPA's attestation standards.

e. A statement that the responsible party is responsible for the subject matter.

f. A statement that the engaging party agrees to provide the auditor, before completing the engagement, with a written agreement and acknowledgment that the procedures performed are appropriate for the intended purpose of the engagement.

g. A statement that the engaging party agrees to provide, at the conclusion of the engagement, a representation letter.

h. If known at the onset of the engagement, identification of any other parties, in addition to the engaging party, that will be requested to agree to the procedures and acknowledge that the procedures performed are appropriate for their purposes. If the request is expected to be made by the engaging party, a statement that the engaging party agrees to provide, at the conclusion of the engagement, a written representation that the engaging party has obtained from all necessary other parties agreement to the procedures and acknowledgment that the procedures performed are appropriate for their purposes.

i. If the engaging party is not the responsible party, a statement that written representations may be requested from the responsible party.

j. Reference to the expected form and content of the agreed-upon procedures report, including any use restrictions, if applicable.

k. Disclaimers expected to be included in the agreed-upon procedures report, if applicable.

l. Assistance to be provided to the auditor, if applicable.

m. Involvement of an auditor's external specialist, if applicable (see AT-C 215.19).

n. Specified thresholds for reporting exceptions, if applicable.

.05 The procedures to be enumerated or referred to in the agreed-upon procedures report should be performed by the engagement team, which may include participating practitioners,[12] and not by internal auditors (AT-C 215.21).

.06 The auditor should perform procedures agreed to and acknowledged by the engaging party to meet the intended purpose of the engagement established with the engaging party (AT-C 215.16). The auditor should not perform procedures that are open to varying interpretations or use vague or ambiguous language. Terms of uncertain meaning (such as general review, limited review, check, or test) should not be used in describing the procedures unless such terms are defined within the procedures (AT-C 215.17).

.07 The auditor should obtain evidence from applying the agreed-upon procedures to provide a reasonable basis for the finding(s) expressed in the agreed-upon procedures report but need not perform additional procedures outside the scope of the engagement to gather additional evidence (AT-C 215.18). If matters come to the auditor's attention by other means that significantly contradict the subject matter, the auditor should discuss the matter with the engaging party and take appropriate action, including determining whether the agreed-upon procedures report should be revised to disclose the matter (AT-C 215.40). For example, if during the course of applying agreed-upon procedures regarding an entity's internal control, the auditor becomes aware of a material weakness by means other than performance of the agreed-upon procedures, the auditor may include this matter in the report (AT-C 215.A72). The auditor may do this by mentioning the material weakness with a footnote reference to another report where it is described in detail.

.08 In the event the auditor encounters known or suspected fraud or noncompliance with laws, regulations, contracts, or grant agreements in connection with the engagement, the auditor should consider responsibilities under the AICPA Code of Professional Conduct and applicable law prior to communicating such information either to the responsible party or to the engaging party (AT-C 215.41 and GAGAS (2018) 7.17). Disclosure of confidential information as defined in the AICPA Code of Professional Conduct requires the explicit consent of the engaging party or the responsible party, as appropriate. In circumstances in which such matters are identified, the auditor may consider discussing with legal counsel or others prior to communicating or taking further action (AT-C 215.A74).

.09 When circumstances impose restrictions on performing the agreed-upon procedures, the auditor should discuss with the engaging party whether those restrictions are appropriate and, if so, describe them in the agreed-upon procedures report (AT-C 215.39).

Written Representations

.10 The auditor should request from the engaging party written representations in the form of a letter addressed to the auditor (AT-C 215.27). The date of the written representations should be as of the date of the agreed-upon procedures report.

[12]A participating practitioner is part of the engagement team and performs attestation work related to a portion of the subject matter for purposes of the attestation engagement (AT-C 105.12). A participating practitioner may be part of the auditor's organization or another organization (AT-C 100.A68).

The representations should address the subject matter and periods covered by the auditor's findings. (AT-C 215.29) The representations should include the following (AT-C 215.27):

a. A statement that the responsible party is responsible for the subject matter.

b. If applicable, a statement that the engaging party has obtained from all necessary parties agreement to the procedures and acknowledgment that the procedures are appropriate for their purposes.

c. A statement that the engaging party has provided the auditor with all relevant information and access, as applicable, as agreed upon in the terms of the engagement.

d. A statement that all known matters contradicting the subject matter and any communication from regulatory agencies or others affecting the subject matter have been disclosed to the auditor, including communications received between the end of the period addressed by the subject matter and the date of the agreed-upon procedures report.

e. A statement that the engaging party is not aware of any material misstatements in the subject matter.

f. A statement that the engaging party has disclosed to the auditor all known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter.

g. Any additional representations that the auditor determines are appropriate.

FAM 710 B provides an example of an engaging party's representation letter for an agreed-upon procedures engagement.

.11 When the engaging party is not the responsible party, the auditor should consider requesting the relevant written representations from the responsible party in the form of a letter addressed to the auditor (AT-C 215.28). FAM 710 C provides an example of a responsible party's representation letter for an agreed-upon procedures engagement.

.12 When one or more of the requested written representations are not provided, or the auditor concludes either that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations or that the written representations are otherwise not reliable, the auditor should

a. discuss the matter with the engaging or responsible party, as appropriate;

b. reevaluate the integrity of those from whom the representations were requested or received and evaluate the effect that this may have on the reliability of representations and evidence in general; and

c. if any of the matters are not resolved to the auditor's satisfaction, take appropriate action, including determining the possible effect on the agreed-upon procedures report (AT-C 215.30).

Reporting

.13 The agreed-upon procedures report should be in writing and in the form of procedures and findings (AT-C 215.31 and .32). If, as a result of performing the procedures, the auditor determines that the description of the procedures

performed or the corresponding findings, in the auditor's professional judgment, are misleading in the circumstances of the engagement, the auditor should discuss the matter with the engaging party and take appropriate action (AT-C 215.33).

.14 The agreed-upon procedures report should include the following (AT-C 215.34), as shown in the example report in FAM 710 D:

a. A title that includes the word "independent" to clearly indicate that it is the report of an independent accountant.

b. An appropriate addressee as required by the circumstances of the engagement.

c. Identification of the engaging party.

d. Identification of the subject matter to which the procedures have been applied.

e. Identification of the responsible party, including a statement that the responsible party is responsible for the subject matter. When the engaging party is not the responsible party and identification of the responsible party and its responsibility for the subject matter is based solely on representations received from the engaging party, the agreed-upon procedures report should include a statement to that effect.

f. A statement that the engaging party acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement.

g. An identification of the intended purpose of the engagement in sufficient detail to enable the user to understand the nature of the work performed.

h. A statement that the agreed-upon procedures report may not be suitable for any other purpose.

i. A statement that the procedures performed may not address all the items of interest to a user of the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

j. A statement that an agreed-upon procedures engagement involves the auditor performing specific procedures that the engaging party has agreed to and acknowledged to be appropriate for the intended purpose of the engagement and reporting on findings based on the procedures performed.

k. A description of the procedures performed detailing the nature and extent and, if applicable, the timing of each procedure.

l. A description of the findings from each procedure performed, including sufficient details on exceptions found.

m. If applicable, a description of any specified threshold that the engaging party established for reporting exceptions.

n. A statement that the agreed-upon procedures engagement was conducted in accordance with the AICPA's attestation standards.

o. A statement that the auditor was not engaged to and did not conduct an examination or review, the objective of which would be to express an opinion or conclusion, respectively, on the subject matter.

p. A statement that the auditor does not express such an opinion or conclusion.

q. A statement that had the auditor performed additional procedures, other matters might have come to the auditor's attention that would have been reported.

r. A statement that the auditor is required to be independent of the responsible party and to meet the auditor's other ethical responsibilities, in accordance with the relevant ethical requirements relating to the agreed-upon procedures engagement.

s. If applicable, a description of the nature of the assistance that an auditor's external specialist provided (see AT-C 215.20).

t. When applicable, reservations or restrictions concerning procedures or findings (see FAM 710.18).

u. The manual or printed signature of the audit organization.

v. The city and state where the report is issued.

w. The date of the report. The report should be dated no earlier than the date on which the auditor completed the procedures and determined the results, including that the attestation documentation has been reviewed and if applicable, the written presentation of the subject matter has been prepared.

.15 The auditor should present the results of applying agreed-upon procedures to specific subject matter in the form of findings and should report all findings arising from such application (AT-C 215.24 and .25). A threshold for reporting exceptions does not apply to findings reported in an agreed-upon procedures engagement unless the engaging party establishes such a threshold (AT-C 215.A37). If the engaging party has established such a threshold, the auditor should describe it in the agreed-upon procedures report (AT-C 215.25).

.16 The auditor should consider whether to include an alert, in a separate paragraph, that restricts the use of the auditor's agreed-upon procedures report, taking into account the understanding with the engaging party regarding the nature of the engagement (AT-C 215.35). Although use of the report may be restricted to specified parties for its intended purpose(s), governmental reports are generally a matter of public record. Therefore, generally the distribution of the report is not limited, and the audit organization may provide copies upon request. However, contractual, legal, or other restrictions may limit distribution. See AT-C 215.35 through .38 for additional guidance on restricting the use of the report.

.17 The auditor may have performed agreed-upon procedures on an element, account, or item of the financial statements and also audited the same financial statements. If the audit report on the financial statements includes a departure from a standard report, the auditor may refer to the audit report and the departure from the standard report in the agreed-upon procedures report. (AT-C 215.A73)

.18 The auditor may include in the agreed-upon procedures report reservations or restrictions concerning procedures or findings, such as the following (AT-C 215.A60):

a. disclosure of stipulated facts, assumptions, or interpretations (including the source thereof) used in the application of procedures;

b. description of the condition of records, controls, or data to which the procedures were applied;

c. explanation that the auditor has no responsibility to update the report; and

d. explanation that the sample may not be representative of the population.

.19 When reporting findings, the auditor should not

a. use vague or ambiguous language,

b. include terms of uncertain meaning, and

c. express an opinion or conclusion on the subject matter or about whether the subject matter is in accordance with (or based on) the criteria (AT-C 215.26).

The following table provides examples of appropriate and inappropriate descriptions of findings.

Table 710.1: Examples of Appropriate and Inappropriate Descriptions of Findings Resulting from Applying Certain Agreed-Procedures

	Description of findings	
Agreed-upon procedures	**Appropriate**	**Inappropriate**
Based on the total tax liability, select and recalculate the 50 largest excise tax returns from the quarter ended September 30, 20XX, and compare these amounts with those in the certified audit file.	Recalculated amounts for the selected excise tax returns agreed with the amounts in the certified audit file.	Nothing came to our attention as a result of applying this procedure.
Select a random sample of 45 general ledger postings of revenue receipts for the year; compare with supporting documentation to determine whether reported revenue receipts were properly recorded as to amount and classification.	Revenue receipts selected randomly from the year's general ledger postings were properly classified and in agreement with supporting documentation.	The revenue receipts approximated the amount indicated by supporting documentation.
Examine personnel files of 40 individuals randomly selected from the timekeeping records for the year; determine whether the selected files contain a current and approved Notification of Personnel Action (Standard Form 50).	Thirty of the selected files contained a current and approved Notification of Personnel Action. Ten files did not contain a current and approved Notification of Personnel Action *(list and identify exceptions)*.	Some of the personnel files did not contain a current and approved Notification of Personnel Action.

.20 If the audit organization's procedure is to date reports with the issue date, the auditor may state the date of completion of the engagement in the report, such as "We completed the agreed-upon procedures on [date]."

.21 The auditor should obtain report comments from the party responsible for the subject matter. These comments can be either written or oral. If oral comments are obtained, the auditor should document them in a memorandum.

.22 Prior to issuing the agreed-upon procedures report, the auditor should obtain a written agreement on the procedures and acknowledgment from the engaging party that the procedures performed are appropriate for the intended purpose of

the engagement (AT-C 215.22). The written agreement and acknowledgment may be documented in the engagement letter, an addendum to the engagement letter, a representation letter, or some other form of written communication (AT-C 215.A35). If the engaging party refuses to provide the written agreement and acknowledgment, the auditor should withdraw from the engagement (AT-C 215.23).

Documentation

.23 Although the quantity, type, and content of documentation varies with the circumstances, the auditor should document sufficient information to demonstrate that the work was adequately planned and supervised and that the evidence provides a reasonable basis for the report as discussed in GAGAS.

.24 The auditor should document sufficient information to enable an experienced auditor having no previous connection with the engagement to ascertain from the documentation the nature, timing, extent, and results of procedures performed and the evidence that supports the report, including its sources.

.25 The auditor should prepare engagement documentation on a timely basis that includes the following (AT-C 215.42):

a. The written agreement and acknowledgment from the engaging party regarding the appropriateness of the procedures performed for the intended purpose of the engagement.

b. The nature, timing, and extent of the procedures performed to comply with relevant AT-C sections (see FAM 710.01) and applicable legal and regulatory requirements, including

- the identifying characteristics of the specific items or matters tested;
- who performed the engagement work and the date such work was completed;
- when the appropriate party will not provide one or more of the requested written representations or the auditor concludes either that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations or that the written representations are otherwise not reliable, the matters in FAM 710.12; and
- who reviewed the engagement work performed and the date and extent of such review.

c. The results of the procedures performed and the evidence obtained.

d. If the engagement is subject to an engagement quality review,

- the identity of the engagement quality reviewer for the engagement and the date and extent of such review and
- that the engagement quality review has been completed before the release of the agreed-upon procedures report.

.26 The auditor generally should include in the engagement documentation the following:

a. Consideration of the results of any identified relevant agreed-upon procedures reports and follow-up on any significant findings that directly relate to the agreed-upon procedures engagement.

b. Any laws, regulations, contracts, or grant agreements applicable to the agreed-upon procedures.

c. Any indication of fraud, abuse, or noncompliance with laws, regulations, contracts, or grant agreements; if there was such indication, the auditor's response, including any related communications.

.27 The auditor generally should prepare a summary memorandum that summarizes the work performed and results; refers to the detailed documentation; and includes the auditor's conclusion on whether the work was performed in accordance with GAGAS, the AICPA attestation standards, and the FAM and whether the report is appropriate. FAM 710 E provides an agreed-upon procedures engagement completion checklist.

710 A – Example Agreed-Upon Procedures Engagement Letter

(The examples in 710 A through 710 D assume that the engaging party is ABC Entity and the responsible party is XYZ Entity.)

[Date]

Management of ABC Entity

Subject: Fiscal Year 20XX Agreed-Upon Procedures for the Tax Trust Fund

Dear Management Official:

This letter responds to your letter of **[date]** requesting that we assist ABC Entity in determining the completeness and accuracy of receipts transferred to the ABC tax trust fund by XYZ Entity. On **[date]**, we met with you to discuss the scope and timing of our work. The detailed procedures we agree to perform are enclosed. We plan to perform these procedures on **[provide date(s)]**.

This letter documents our agreement to perform these agreed-upon procedures related to fiscal year 20XX. We will perform these procedures in accordance with U.S. generally accepted government auditing standards, which incorporate the attestation standards established by the American Institute of Certified Public Accountants.

We will provide XYZ Entity with a draft copy of our report for its review and comment and plan to issue the report by **[date]**. At the conclusion of the engagement, management of ABC Entity acknowledges its responsibility to provide to us a representation letter. Written representations may also be requested from XYZ Entity. We will meet with you as needed to discuss the agreed-upon procedures, results, and other issues that may arise.

The appropriateness of the agreed-upon procedures to meet the objectives of ABC Entity is solely your responsibility. Accordingly, we make no representation regarding their appropriateness to meet your needs or for any other purpose. Prior to the completion of the engagement, management of ABC Entity acknowledges its responsibility to provide us with a written agreement and acknowledgment that the procedures performed are appropriate for the intended purpose of this engagement. In addition, because of the nature of agreed-upon procedures, the results we obtain will only be applicable to the period for which they are performed. We are not engaged to perform, and will not perform, an examination or audit, the objective of which would be to express an opinion on the amount of receipts transferred to the tax trust fund for fiscal year 20XX. Accordingly, we will not express such an opinion. If we were to perform an examination or audit, other matters beyond the scope of the agreed-upon procedures might come to our attention.

The report we will prepare is intended solely for your information and use and is not intended to be, and should not be, used by any other party. However, our report will be a matter of public record and will be provided to others upon request. Unless we hear from you, we will assume

that you concur with these procedures and their appropriateness for your purposes.[13] If you have any questions, please contact me at **[telephone number and email address]** or **[alternative contact]** at **[telephone number and email address]**.

Sincerely,

[Signed]

[Name of Director]
[Title]
[Audit Organization]

Enclosure

cc: XYZ Entity

[13]The auditor may request that the users document their agreement with the procedures and their appropriateness for their purposes by signing the engagement letter and returning it to the auditor.

710 B – Example Representation Letter from Engaging Party on Agreed-Upon Procedures Engagement

[ABC Entity letterhead]

[Date (as of the date of the agreed-upon procedures report)]

Dear Auditor:

In connection with the agreed-upon procedures engagement for XYZ Entity's budget execution process for the period from October 1, 20XX, through September 30, 20XX, we confirm to the best of our knowledge and belief, the following representations made to you in performing these agreed-upon procedures.

- We acknowledge that XYZ Entity is responsible for the budget execution process.
- We have obtained from all necessary parties agreement to the procedures and acknowledgment that the procedures are appropriate for their purposes.
- We know of no matters that would contradict our understanding of XYZ Entity's budget execution process, including matters occurring between September 30, 20XX, and the date of the agreed-upon procedures report.
- There have been no communications from regulatory or oversight agencies concerning XYZ Entity's budget execution process or noncompliance with budgetary laws or the Antideficiency Act, including communications received between September 30, 20XX, and the date of the agreed-upon procedures report.
- We have made available to you all relevant information and access pertaining to XYZ Entity's budget execution process during the period from October 1, 20XX, through September 30, 20XX, as agreed upon in the terms of the engagement.
- We are not aware of any material misstatement regarding XYZ Entity's budget execution process.
- We have disclosed to you all known events subsequent to the period being reported on that would have a material effect on XYZ Entity's budget execution process.

Sincerely,

[signed]

[Official's Name]
[Official's Title]
ABC Entity

710 C – Example Representation Letter from Responsible Party on Agreed-Upon Procedures Engagement

[XYZ Entity letterhead]

[Date (as of the date of the agreed-upon procedures report)]

Dear Auditor:

In connection with the agreed-upon procedures engagement for ABC Entity's budget execution process for the period from October 1, 20XX, through September 30, 20XX, we confirm to the best of our knowledge and belief the following representations made to you in performing these agreed-upon procedures.

- We acknowledge responsibility for our budget execution process.
- We are not aware of any material misstatement regarding our budget execution process.
- We have made available to you all records and related data pertaining to our budget execution process during the period from October 1, 20XX, through September 30, 20XX.
- We have disclosed to you all known events subsequent to the period (or point in time) being reported on that would have a material effect on our budget execution process.
- XYZ Entity's budget execution process is designed to meet the requirements of the Antideficiency Act.
- XYZ Entity's employees check the accounting records and fund status reports quarterly to determine whether all source documents that affect the appropriation and fund balance have been recorded properly, accurately, and timely.
- XYZ Entity's financial management system provides timely disclosure of total valid obligations incurred to date and total budgetary resources available for obligation within each apportionment.
- The system also provides timely disclosure of the authorization or creation of commitments, obligations, or expenditures that exceed apportionments and allotments.
- We are not aware of instances of noncompliance with the above-stated procedures.
- We are not aware of instances of fraud involving management, employees, or contractor staff who have significant roles in the operation of our budget execution process.
- We have no plans or intentions that would materially affect our budgetary process or operations.

Sincerely,

[signed]

[Official's name]
[Official's title]
XYZ Entity

710 D – Example Agreed-Upon Procedures Report Where the Engaging Party Is Not the Responsible Party

[Date]

Management of ABC Entity

Subject: Independent Accountant's Report on Applying Agreed-Upon Procedures: Count of Cash and Related Items of XYZ Entity

Dear Management Official:

We have performed the procedures described in the enclosure to this report on the count of cash and cash-related items of XYZ Entity at September 30, 20XX, with which you agreed. XYZ Entity management is responsible for the count of its cash and cash-related items at September 30, 20XX. ABC Entity acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement. We performed these procedures solely to meet your needs for an independent count of cash and cash-related items of XYZ Entity at September 30, 20XX. Consequently, we make no representation regarding the appropriateness of the procedures described in this report either for the purpose for which this report has been requested or for any other purpose.

We conducted the engagement in accordance with U.S generally accepted government auditing standards, which incorporate attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to perform, and did not perform, an examination or review, the objective of which would have been to express an opinion or conclusion, respectively, on the amount of cash on hand. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that we would have reported to you.

The procedures we agreed to perform consist of counting amounts for cash and related receipts and comparing combined totals to the authorized amounts. These procedures may not address all the items of interest to a user of the report and may not meet the needs of all users of the report. As such, users are responsible for determining whether these procedures are appropriate for their purposes. The enclosure describes the agreed-upon procedures and our findings. We completed our agreed-upon procedures on [date of completion].

We are required to be independent of XYZ Entity and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

We requested comments on a draft of this report from XYZ Entity representatives. They agreed with the results presented in this report and had no comments.

The purpose of this report is solely to describe agreed-upon procedures related to an independent count of the cash and cash-related items of XYZ Entity at September 30, 20XX, and the report is not suitable for any other purpose. However, this report is a matter of public record, and its distribution is not limited. The report is available at no charge at **[website]**.

If you have any questions, please call **[name, title, and telephone number]**.

Sincerely,

[Signed]

[Name of Director], Director
[Audit Organization]
[City, State]

Enclosure

cc: XYZ Entity

Enclosure

Results of Cash Counts

Procedures

We counted and totaled cash on hand for the petty cash fund of XYZ Entity at September 30, 20XX. We also listed and totaled the receipts on hand evidencing disbursements from the fund. Finally, we compared the combined total of cash and receipts available to the amount authorized for the fund of $500.

Results

We counted cash totaling $258.96 and scheduled 14 receipts totaling $174.85, which accounted for $433.81 of the $500 in authorized petty cash funds. In addition, the XYZ Entity custodian provided us two separate Expense Summary Report and Petty Cash Itemization Sheets and related receipts for an additional $65.09, which had been submitted for reimbursement to the fund. There remains an unexplained difference (shortage) of $1.10 between the authorized amount and the total cash and receipts evidencing petty cash fund disbursements.

710 E – Agreed-Upon Procedures Engagement Completion Checklist

Engaging party: _____

Job code: _____

Principal report: _____

.01 This checklist is intended to help the auditor comply with the standards for agreed-upon procedures engagements.

.02 Several of the last steps are specific to GAO's quality control. GAO auditors should complete those steps. Non-GAO auditors may use those steps or tailor them as appropriate.

Steps	Yes, no, or N/A	Doc. Ref.
1. Are all the preconditions for an agreed-upon procedures engagement present?		
2. Has the engagement team documented an understanding with the individuals requesting the agreed-upon procedures in an engagement letter?		
3. Does the engagement letter include the following? • The nature of the engagement. • Identification of the subject matter and the responsible entity. • Auditor's responsibilities. • Reference to GAGAS and a statement that the engagement will be conducted in accordance with the AICPA's attestation standards. • A statement that the responsible party is responsible for the subject matter. • A statement that the engaging party agrees to provide the auditor, prior to the completion of the engagement, a written agreement and acknowledgment that procedures performed are appropriate for the intended purpose of the engagement. • A statement that the engaging party agrees to provide a representation letter at the conclusion of the engagement. • If the engaging party is not the responsible party, a statement that written representations may be requested from the responsible party. • Reference to the expected form and content of the report, including expected disclaimers and use restrictions, if applicable.		

Steps	Yes, no, or N/A	Doc. Ref.
• If applicable, identification of other parties in addition to the engaging party that will be requested to agree to the procedures and acknowledge that the procedures performed are appropriate for their purposes (see AT-C 215.15h). • Assistance to be provided to the auditor, if applicable. • Involvement of an auditor's external specialist, if applicable. • Specified thresholds for reporting exceptions, if applicable.		
4. Was an entrance conference held with the responsible entity?		
5. Did the auditor obtain written representations from the engaging party?		
6. When the engaging party is not the responsible party, did the auditor consider requesting the relevant written representations from the responsible party?		
7. Were written representations that the auditor obtained from the engaging party and responsible party, as applicable, dated as of the date of the agreed-upon procedures report, and do these representations address the subject matter and periods covered by the auditor's findings?		
8. Does the documentation contain the following? • Written agreement and acknowledgment from the engaging party regarding the appropriateness of the procedures performed for the intended purpose of the engagement. • The nature, timing, and extent of the procedures performed to comply with relevant AT-C sections (see FAM 710.01) and applicable legal and regulatory requirements, including the following: o Identifying characteristics of the specific items or matters tested. o Who performed the engagement work and the date such work was completed. o Who reviewed the engagement work performed and the date and extent of such review. o If applicable, the matters described in FAM 710.12. • Results of the procedures performed and the evidence obtained. • Consideration of the results of any identified relevant agreed-upon procedures reports and follow-up on any significant findings that directly relate to the agreed-upon procedures engagement.		

Steps	Yes, no, or N/A	Doc. Ref.
• Any laws, regulations, contracts, or grant agreements applicable to the procedures. • Any indication of fraud, abuse, or noncompliance with laws, regulations, contracts, or grant agreements; if there was such indication, the auditor's response, including any related communications.		
9. Does the documentation demonstrate that the work was adequately planned and supervised and that the evidence provides a reasonable basis for the agreed-upon procedures report?		
10. Does the summary memorandum appropriately summarize the work performed and results; refer to detailed documentation; and include the auditor's conclusion on whether the work was performed in accordance with GAGAS, the AICPA attestation standards, and the FAM and whether the report is appropriate?		
11. If there were departures from any applicable "should" procedures in the FAM: • Was the basis for the departure documented? • Did the audit director approve the documentation? • Did the auditor provide the documentation to the reviewer in a timely manner to allow any issues to be promptly identified and resolved?		
12. Was an exit conference held with the responsible entity?		
13. Was the report referenced to supporting documentation?		
14. [GAO only] Did the assistant director review the following? • Documentation of the understanding with the individuals requesting the procedures and officials of the entity. • Memorandum of entrance conference with the responsible entity. • Completed work plans and procedures. • Memorandums on key engagement issues. • Summary of the results of the procedures. • Memorandum of exit conference with the responsible entity. • Deviations from standard reporting language. • Financial schedules/statements, if applicable. • Representation letter(s) from the engaging party and responsible party, as appropriate.		

Steps	Yes, no, or N/A	Doc. Ref.
• Agreed-upon procedures report. • GAO Engagement Management and Product File.		
15. [GAO only] Did the audit director review the following? • Documentation of the understanding with the individuals requesting the procedures and officials of the entity. • Summary of results of the procedures. • Memorandum of exit conference with responsible entity. • Deviations from standard reporting language. • Agreed-upon procedures report. • Financial schedules/statements, if applicable. • Representation letter(s) from the engaging party and responsible party, as appropriate.		
16. [GAO only] Did the assistant director or the auditor-in-charge determine that all significant review notes were resolved appropriately?		
17. Is the report appropriate as to the following? • Wording. • Scope of work. • GAGAS. • Explanatory paragraphs.		
18. Is the agreed-upon procedures report dated appropriately, or does the report indicate when the auditor completed the engagement?		

Note: The auditor should discuss all “No” answers in attached documentation. If the reason that a question is “N/A” is not obvious, the auditor should document the reason on the checklist or in an attachment.

Date of completion of the engagement _____

Auditor-in-Charge _____ Date _____

Assistant Director _____ Date _____

Audit Director _____ Date _____

ENGAGEMENT QUALITY CONTROL REVIEW (SECOND PARTNER)

AGREED-UPON PROCEDURES

Objective: To objectively review significant engagement matters to conclude, based on all facts the second partner (or equivalent) has knowledge of, that no matters were found that caused the second partner (or equivalent) to believe that (1) the procedures were not performed in accordance with GAGAS, which incorporate attestation standards established by the AICPA, and (2) the report does not meet professional standards and audit organization policies.

Procedures: Before the report was issued, I performed the following procedures:

- as necessary, discussed significant engagement issues with the audit director;
- read documentation of key decisions and consultations;
- read the agreed-upon procedures report; and
- confirmed with the audit director that there are no unresolved issues.

Conclusions: Based on all the relevant facts of which I have knowledge, I found no matters that caused me to believe that (1) the agreed-upon procedures were not performed in accordance with GAGAS and the AICPA's attestation standards related to agreed-upon procedures engagements and (2) the report is not in accordance with professional standards and audit organization policies.

In signing this form, I acknowledge that there have been no personal or external impairments to independence regarding my work on this engagement.

_____

Title **Signature** **Date**

SECTION 800

Compliance

Contents of Compliance

	FAM
General Compliance Checklist	802
Antideficiency Act (ADA), as Provided Primarily in 31 U.S.C. Chapters 13, 15	803
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Federal Debt Collection Authorities, as Provided in 31 U.S.C. Chapter 37	805
Prompt Payment Act (PPA), as Provided in 31 U.S.C. Chapter 39	806
Pay and Allowance System for Civilian Employees, as Provided Primarily in 5 U.S.C. Chapters 51-59	807
Civil Service Retirement Act (CSRA), as Provided in 5 U.S.C. Chapter 83	808
Federal Employees Health Benefits Act (FEHBA), as Provided in 5 U.S.C. Chapter 89	809
Federal Employees' Compensation Act (FECA), as Provided in 5 U.S.C. Chapter 81	810
Federal Employees' Retirement System Act (FERSA), as Provided in 5 U.S.C. Chapter 84	811

802 – General Compliance Checklist

.01 This section contains the General Compliance Checklist (Form 802) for identifying laws and regulations for compliance testing (see FAM 245, Identify Significant Provisions of Applicable Laws, Regulations, Contracts, and Grant Agreements, and FAM 295 H, List of General Laws). This checklist assists the auditor in meeting the requirement in FAM 245.03 to obtain sufficient appropriate audit evidence regarding material amounts and disclosures in the financial statements that are determined by provisions of those laws, regulations, contracts, and grant agreements generally recognized to have a direct effect on their determination and thereby complying with GAGAS and AU-C 250, *Consideration of Laws and Regulations in an Audit of Financial Statements*.

.02 The checklist contains frequently encountered laws that apply to many federal entities and procedures for identifying other laws and regulations for compliance testing (see FAM 802.08). The compliance supplements in FAM 803 through 811 provide detailed guidance for assessing the effectiveness of compliance controls and testing compliance with significant provisions of frequently encountered laws. The General Compliance Checklist and compliance supplements do not include guidance related to contracts and grant agreements, which are discussed in FAM 245.

.03 The auditor generally should complete the General Compliance Checklist or its equivalent for federal financial statement audits. If the auditor determines that a frequently encountered law listed on this checklist is significant for purposes of compliance testing, the auditor should also complete the corresponding compliance supplement.

.04 To understand and evaluate compliance controls, the auditor should also follow the guidance in FAM 260, Understand the Entity's Internal Control, and FAM 300, Internal Control Phase. The FAM also provides additional guidance on compliance considerations for all audit phases.

Instructions for General Compliance Checklist

.05 The checklist contains a summary for each frequently encountered law. The auditor indicates whether each law is significant for purposes of compliance testing by answering yes or no to the question in each summary.

.06 The auditor may use estimates or interim information in the preliminary column. The final amounts (based on the audited amounts or the final amounts of available budget authority) are used to determine whether all laws that would be significant in quantitative terms have been identified for control and compliance testing. The auditor should document the sources of all amounts included in this checklist. If the auditor determines the law is significant from a qualitative standpoint, then the auditor should document the reasons for this conclusion.

.07 The checklist also contains procedures that the auditor should perform to identify other laws and regulations for compliance testing.

.08 Frequently encountered laws that the auditor may test are as follows:

Law	Supplement number
Antideficiency Act (ADA), as provided primarily in 31 U.S.C. chapters 13, 15	FAM 803
Federal Credit Reform Act of 1990 (FCRA), as provided in 2 U.S.C. §§ 661-661f	FAM 804
Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37	FAM 805
Prompt Payment Act (PPA), as provided in 31 U.S.C. chapter 39	FAM 806
Pay and Allowance System for Civilian Employees as provided primarily in 5 U.S.C. chapters 51-59	FAM 807
Civil Service Retirement Act (CSRA), as provided in 5 U.S.C. chapter 83	FAM 808
Federal Employees Health Benefits Act (FEHBA), as provided in 5 U.S.C. chapter 89	FAM 809
Federal Employees' Compensation Act (FECA), as provided in 5 U.S.C. chapter 81	FAM 810
Federal Employees' Retirement System Act (FERSA), as provided in 5 U.S.C. chapter 84	FAM 811

Entity _____

Period of financial statements _____

Job code _____

Description of law	Yes / No
Antideficiency Act (ADA), as provided primarily in 31 U.S.C. chapters 13, 15 (31 U.S.C. §§ 1341(a)(1)(A), (B); and 31 U.S.C. § 1517(a))[1] This law imposes restrictions on the amounts of obligations or expenditures that entities may make. More specifically, this law provides that the entity's officers or employees, unless authorized by law, shall not: 1. make or authorize expenditures or obligations that exceed the amount available for expenditure or obligation in an appropriation or a fund; 2. involve the U.S. government in a contract or an obligation for the payment of money for any purpose before an appropriation for such purpose is made; or 3. make or authorize expenditures or obligations that exceed the amount of an apportionment (or reapportionment, if applicable) or a lesser amount, if any, established by entity regulations (*e.g.,* an allotment level). As discussed in FAM 250, Identify Relevant Budget Restrictions, the auditor should obtain information on the entity's budget authority, from sources such as appropriation statutes, and identify all legally binding restrictions on budget execution. *Does the entity have appropriations or other funds that are limited to an amount or a specified period of availability?* Because the Antideficiency Act has no materiality limit, the auditor should complete the compliance supplement at FAM 803.	_____

[1]See also 31 U.S.C. § 1341(c), which provides that in the event of a lapse in appropriations beginning on or after December 22, 2018, employees of the U.S. government or of a District of Columbia public employer, who are furloughed or required to work during such a lapse, must subsequently be timely compensated after the lapse in appropriations ends.

Description of law	Yes / No
Federal Credit Reform Act of 1990 (FCRA), as provided in 2 U.S.C. §§ 661-661f (2 U.S.C. § 661c(b), (e)) This law contains numerous provisions relating to the recording of activity related to direct loans, loan guarantees, and related loan modifications for budget accounting purposes. The law provides that on or after October 1, 1991, an agency may incur new direct loan obligations or make new loan guarantee commitments only to the extent that an appropriation or other budget authority is available to cover the costs of the direct loan or loan guarantee. *Does the entity's budget authority available during the audit period for direct loan obligations, loan guarantee commitments, or any related loan modifications exceed materiality, or did the auditor determine that FCRA has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary / Final Total appropriations or other budget authority available during the fiscal year for costs of FCRA activities (direct loans, direct loan obligations, loan guarantees, loan guarantee commitments, and related loan modifications) _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 804	_____

Description of law	Yes / No
Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37 (31 U.S.C. § 3711; 31 U.S.C. § 3717(a), (b), (c), (e), (f); and 31 U.S.C. § 3719) These authorities address the collection of claims of the U.S. government, which involve most nontax amounts (a.k.a., debts) that have been determined by an appropriate federal official to be owed to the U.S. government from nonfederal parties. These authorities generally apply in the absence of more specific legal requirements that directly address claims for particular circumstances. Interest generally accrues from the date that a notice stating the amount due and the interest policies is first mailed to the debtor. Interest generally accrues at a rate established by the Secretary of the Treasury. Generally, administrative costs and penalties shall also be charged. The authorities also require the entity to take all appropriate steps to collect the debt before discharging it and to notify Treasury about delinquent debt for the use of certain debt collection tools, such as administrative offset. The authorities also generally require the entity not to make or guarantee loans to persons who owe delinquent debt. Further, in appropriate circumstances, the authorities permit the compromise, termination, or suspension of claims. *Does the cumulative amount of receivables created during the audit period that is subject to the Federal Debt Collection Authorities exceed materiality?* *Does the amount of receivables at the end of the audit period that is subject to the Federal Debt Collection Authorities exceed materiality?* *Did the auditor determine that the Federal Debt Collection Authorities have a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* (continue to next page)	_____ _____ _____

Description of law	Yes / No
Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37 (31 U.S.C. § 3711; 31 U.S.C. § 3717(a), (b), (c), (e), (f); and 31 U.S.C. § 3719) (continued from prior page) Preliminary / Final Cumulative amount of receivables created during the audit period that is subject to the Federal Debt Collection Authorities _____ _____ or Amount of receivables at the end of the audit period that is subject to the Federal Debt Collection Authorities _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 805. Note: These Federal Debt Collection Authorities generally do not apply to amounts payable to the entity under the Internal Revenue Code, the Social Security Act, or the tariff laws. Those laws contain specific provisions for these amounts.	

Description of law	Yes / No
Prompt Payment Act (PPA), as provided in 31 U.S.C. chapter 39 (31 U.S.C. § 3902(a), (b), (f) and 31 U.S.C. § 3904) The Prompt Payment Act requires federal entities to make payments for property or services by the due dates specified in the related contracts or, if a payment date is not specified in a contract, generally 30 days after a proper invoice for the amount due is received. If payments are not made within the appropriate period, then the entity shall pay an interest penalty. Also, discounts offered by vendors may be taken only during the specified period. If they are taken after the time period has expired, then an interest penalty shall be paid. Further, federal entities may only pay late payment interest penalties out of amounts made available to carry out the programs for which the penalties are incurred. *Do the entity's payments for property or services subject to the Prompt Payment Act for the audit period exceed materiality, or did the auditor determine that the Prompt Payment Act has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary Final Amount of payments made for property and services subject to the Prompt Payment Act _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 806.	_____

Description of law	Yes / No
Pay and Allowance System for Civilian Employees, as provided primarily in 5 U.S.C. chapters 51-59 (5 U.S.C. § 5332, 5 U.S.C. § 5343, 5 U.S.C. § 5376, and 5 U.S.C. § 5383) These laws require that employees in specific positions be paid at the appropriate pay rates or schedules established by law. These include employees in positions subject to the General Schedule; prevailing rate employees; employees in certain senior-level positions, such as specially qualified scientific and professional personnel; employees appointed to the Senior Executive Service; and employees paid the minimum wage. *Does the entity's payroll expense for the audit period exceed materiality, or did the auditor determine that the Pay and Allowance System for Civilian Employees (as provided primarily in chapters 51 through 59 of Title 5, U.S. Code) has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary / Final Payroll expense _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 807. The entity's expenses for performance awards, cash awards, overtime, travel, transportation, subsistence, or allowances for the audit period usually do not exceed materiality. If, however, the auditor determines that these items or related provisions of the Pay and Allowance System for Civilian Employees are otherwise significant, then the auditor should consult with the Office of the General Counsel (OGC) for specific provisions to be compliance tested.	_____

Description of law	Yes / No
Civil Service Retirement Act (CSRA), as provided in 5 U.S.C. chapter 83, subchapter III This law provides retirement benefits to employees who were hired prior to January 1, 1984. For each employee, the entity withholds a percentage of basic pay from the employee's compensation and contributes an equal amount for retirement. For most employees, the entity contribution shall be paid from the appropriation account or fund used to pay the employee. The employee and entity amounts are deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund. *Does the entity's expense for retirement costs under the Civil Service Retirement Act for the audit period exceed materiality, or did the auditor determine that the Civil Service Retirement Act has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary / Final Expense for retirement contributions _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 808.	_____

Description of law	Yes / No
Federal Employees Health Benefits Act (FEHBA), as provided in 5 U.S.C. chapter 89 This law provides health insurance coverage to employees who elect health insurance benefits. For each employee who elects coverage, the entity pays an amount set by the Office of Personnel Management (OPM) for health insurance costs. The entity portion cannot exceed 75 percent of the insurance cost. For most employees, the entity contribution shall be paid from the appropriation account or fund used to pay the employee. The employee pays the remainder of the total cost. The entity withholds the amount of the employee's portion of the cost from the employee's pay and remits this amount, along with its own contribution, to Treasury for deposit into the Employees Health Benefits Fund. *Does the entity's expense for health insurance costs for the audit period exceed materiality, or did the auditor determine that the Federal Employees Health Benefits Act has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary / Final Expense for health insurance _____ _____ Materiality _____ _____ If yes, then complete the compliance supplement at FAM 809.	_____

Description of law	Yes / No
Federal Employees' Compensation Act (FECA), as provided in 5 U.S.C. chapter 81, subchapter I This law provides for the compensation of employees who are injured while performing their duties. Claims are paid out of the federal Employees' Compensation Fund (Fund). Federal entities are billed annually by the fund for claims paid on their behalf. Billed federal entities, which are funded by annual appropriations, must request an appropriation to cover the billed amounts in their budget requests during the next year. Within 30 days of their availability, amounts appropriated pursuant to the request shall be deposited into the Treasury to the credit of the Fund. If, however, the billed entity does not receive annual appropriations, then it shall make the required deposit into the Treasury to the credit of the Fund from funds under its control during the first 15 days of October after it receives the Fund cost statement. *Does the entity's expense for the audit period for benefits paid by the Fund on the entity's behalf exceed materiality, or did the auditor determine that FECA has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary Final Expense for Compensation Fund claims _____ _____ Materiality _____ _____ If yes, then complete compliance supplement at FAM 810.	_____

Description of law	Yes / No
Federal Employees' Retirement System Act (FERSA), as provided in 5 U.S.C. chapter 84 This law provides retirement benefits for employees who were hired after December 31, 1983, or employees who were previously covered under the Civil Service Retirement Act and elected to be covered under FERSA. For each employee, the entity withholds a percentage of basic pay from the employee's compensation and contributes an amount equal to the employing entity's applicable normal-cost percentage multiplied by the employee's aggregate amount of basic pay payable by the entity. For most employees, the entity contribution shall be paid from the appropriation account or fund used to pay the employee. The employee and entity amounts are deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund. *Does the entity's expense for retirement costs under FERSA for the audit period exceed materiality, or did the auditor determine that FERSA has a direct effect on the determination of material amounts and disclosures in the entity's financial statements?* Preliminary / Final Expense for retirement contributions _____ _____ Materiality _____ _____ If yes, then complete compliance supplement at FAM 811.	_____

Procedures for other laws and regulations	Initials/ date	Doc. ref.
1. Obtain a general understanding of the entity's legal and regulatory framework and how the entity complies with it by performing the following (AU-C 250.12 and .A8): a. Update the auditor's existing understanding or knowledge of the entity's mission and programs, and legal, regulatory, and other external factors. b. Update the auditor's understanding or knowledge of the provisions of laws, regulations, contracts, or grant agreements that are used to directly determine amounts and disclosures in the financial statements. c. Consider the known history of the entity's noncompliance with provisions of laws, regulations, contracts, or grant agreements, including consideration of previous findings identified in audit planning (GAGAS (2018) 6.11, Results of Previous Engagements). d. Inquire of management about the following: i. Other provisions of laws, regulations, contracts, or grant agreements that might have a fundamental effect on the entity's operations. ii. Entity policies and procedures regarding compliance with provisions of laws, regulations, contracts, or grant agreements and the prevention of noncompliance. iii. Entity policies or procedures for identifying, evaluating, and accounting for litigation, contract, or grant agreement claims. iv. The use of directives issued by the entity and periodic representations obtained from management at appropriate levels of authority regarding compliance with provisions of laws, regulations, contracts, or grant agreements.		
2. Identify any other significant provisions of laws or regulations for compliance testing. Attach a list of the other laws or regulations identified to this form, and reference it to control and compliance work performed. The list may be prepared as a table or any other effective means of presenting the information.		
3. As described in FAM 245.07, review the list of laws and regulations identified by the entity as significant and modify the listing in step 2 above to include any additional laws and regulations as needed.		

Procedures for other laws and regulations	Initials/ date	Doc. ref.
4. Provide the laws and regulations listing to OGC. Working in collaboration with the auditors, OGC will review and revise the auditor-prepared listing for accuracy and completeness in identifying and describing significant provisions in applicable laws and regulations that could have a direct effect on the determination of material amounts and disclosures in the entity's financial statements. The auditor makes all determinations regarding materiality. After consulting with OGC, finalize the laws and regulations listing.		
5. Determine whether to test compliance with any indirect laws or regulations and perform the procedures, as discussed in FAM 245.09 through .10. a. Inquire of management and, when appropriate, those charged with governance regarding policies and procedures that prevent noncompliance and whether they are in compliance with those policies and procedures. b. Through other audit procedures that the cycle teams perform that are not directly designed for compliance, determine whether any issues regarding significant provisions of applicable laws, regulations, contracts, or grant agreements were identified. c. Review reports issued by other oversight bodies of the audited entity, such as GAO and the office of the inspector general, for any reported instances of noncompliance and determine if those instances could be material to the financial statements.		
6. For all laws or regulations identified for testing above, identify significant provisions using the criteria in FAM 245.06. Test compliance controls and compliance as described in FAM 300, Internal Control Phase, and FAM 460, Perform Compliance Tests.		

Instructions for Compliance Supplements

.09 Each compliance supplement in FAM 803 through 811 consists of (1) a compliance summary, (2) compliance audit procedures, and (3) footnotes.

Compliance Summary

.10 For each law identified for compliance testing on the General Compliance Checklist, the auditor should complete the related compliance summary or prepare equivalent documentation. The compliance summary is designed to assist the auditor in planning compliance control tests and summarizing the results of compliance control tests and compliance tests for reporting the results of the work performed.

.11 The first column of the compliance summary contains a descriptive title of the provision, an identification of the type of provision, a description of the specific provisions of the law that have been identified for compliance testing, and the legal reference(s) to the provision of law.

.12 The second column of the compliance summary contains the objective related to the specific provision to be used for both compliance control and compliance testing.

.13 In the third column of the compliance summary, the auditor should identify the control activities that the entity has in place to achieve each objective and document the control activity. If the entity does not have a control activity that achieves the objective, then the auditor should document this condition in the third column.

.14 The fourth column of the compliance summary is used to indicate whether the control activity is an information system control (IS control) as described in FAM 340. IS controls are internal controls that depend on information system processing (i.e., processing performed by the entity's IT applications and supporting IT infrastructure). They include user controls, application controls, and general controls. Due to the technical nature of IS controls, the auditor generally should obtain assistance from an IS controls auditor in assessing them. See FAM 340, 350, and 360 for detailed guidance on assessing IS controls.

.15 The fifth column of the compliance summary indicates whether the auditor believes that compliance controls are effective (Yes or No). The auditor should design control tests to determine whether the control activities that have been identified in the third column are in place and operating effectively. A control activity is considered to be effective if it achieves the control objective. The auditor should provide a reference in the fifth column to the supporting documents of the control testing procedures, the control tests, the results of these tests, and the auditor's conclusions on the effectiveness of the compliance controls.

.16 The sixth column of the compliance summary indicates whether the auditor has noted any instances of noncompliance (Yes or No). The auditor should perform compliance tests using the related Compliance Audit Procedures discussed below or prepare equivalent documentation. In this column, the auditor should also refer to the supporting documents for the results of the compliance tests.

Compliance Audit Procedures

.17 Compliance audit procedures are provided for each law. For each law identified for compliance testing on the General Compliance Checklist, the auditor generally should perform each step of the related compliance audit procedures in the first column. Because the subject matter of some laws is closely related to matters the auditor will test in other parts of the audit, the auditor may coordinate with that other testing and design multipurpose tests. For example, payroll compliance testing could be performed using multipurpose tests of payroll controls and/or substantive payroll testing.

The auditor performing the procedure in the first column should initial and date in the second column when the procedure is performed. The auditor should include a reference to the documentation recording the work performed for each step in the third and last column of the compliance audit procedures.

Footnotes

.18 Footnotes are provided for each compliance supplement to assist the auditor in understanding criteria, definitions, exemptions, and restrictions of law. The footnotes also provide guidance to the auditor in testing and evaluating controls to achieve the compliance objective.

803 – Antideficiency Act (ADA), as Provided Primarily in 31 U.S.C. Chapters 13, 15

Note: The auditor should complete this compliance summary or prepare equivalent documentation if the entity has appropriations or other funds that are limited to an amount or a specified period of availability. If so, the provisions of the Antideficiency Act (ADA), as provided primarily in 31 U.S.C. chapters 13, 15, are applicable as indicated on Form 802, General Compliance Checklist. Office of Management and Budget (OMB) guidance on budget execution, including the Antideficiency Act, is included in OMB Circular No. A-11, *Preparing, Submitting, and Executing the Budget,* Part 4, *Instructions on Budget Execution.*

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
803.01. LIMITATIONS ON EXCESS EXPENDITURES AND OBLIGATIONS Provision Type: Quantitative-based. The entity's officers or employees shall not make or authorize expenditures or obligations that exceed the amount available for expenditure or obligation in an appropriation or a fund, unless authorized by law. 31 U.S.C. § 1341(a)(1)(A).	Expenditures or obligations do not exceed the amount available for expenditure or obligation in an appropriation or a fund.	[Document the control activities that the entity used to achieve the objective.][2]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 803 step 3.

[2]The auditor should consider the results of the evaluation and testing of budget controls (see FAM 370). These controls relate to the execution of budget authority and usually are the same controls that are used to comply with the Antideficiency Act. Accordingly, additional determinations of controls that achieve the compliance objective generally are not necessary if the auditor has assessed whether the entity achieves all of the budget control objectives listed in FAM 395 F, *Budget Control Objectives*. The auditor should reference this compliance summary to the budget control evaluation and testing and perform any additional procedures determined to be necessary to conclude on whether compliance controls are effective.

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Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
803.02. LIMITATIONS ON ADVANCE CONTRACTING OR OTHER LEGAL OBLIGATIONS Provision Type: Quantitative-based. The entity's officers or employees shall not involve the U.S. government in a contract or an obligation for the payment of money for any purpose before an appropriation for such purpose is made, unless authorized by law. 31 U.S.C. § 1341(a)(1)(B).	Legal obligations do not occur before an appropriation is made or otherwise authorized by law.				See Compliance Audit Procedures, FAM 803 step 4.
803.03 LIMITATIONS ON EXCESS EXPENDITURES AND OBLIGATIONS RELATED TO APPORTIONMENTS AND ALLOTMENTS Provision Type: Quantitative-based. Unless authorized by law, the entity's officers or employees shall not make or authorize expenditures or obligations that exceed (1) the amount of an apportionment (or a reapportionment, if applicable) or (2) a lesser amount, if any, established by entity regulations (*e.g.,* an allotment level).[3] 31 U.S.C. § 1517(a).	Expenditures or obligations do not exceed the legally binding limit on the entity's budget authority. (The amount of the apportionment or a lesser amount, if any, established by the entity's regulations.) See footnote 2 below.				See Compliance Audit Procedures, FAM 803 step 5.

[3]Entities are required to establish regulations that provide for a system of administrative controls over their execution of budget authority. 31 U.S.C. § 1514(a). As discussed in FAM 250, an entity may elect to lower the level at which budget limitations are legally binding in these regulations. For example, the entity may elect to reduce the legally binding limit on the obligation and expenditure of budget funds from the apportionment level to the allotment level. The auditor should determine the level at which the entity's legally binding limit has been established.

Note: The auditor generally should perform these procedures or prepare equivalent documentation if the entity has appropriations or other funds that are limited to an amount or a specified period of availability. If so, the provisions of the Antideficiency Act (ADA), as provided primarily in 31 U.S.C. chapters 13, 15, are applicable, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. OMB guidance on budget execution, including the Antideficiency Act, is included in OMB Circular No. A-11, *Preparing, Submitting, and Executing the Budget,* Part 4, *Instructions on Budget Execution*.

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Audit procedures	**Initials/ date**	**Doc. ref.**
1. List the appropriations or other budget authority and the related budget accounts that were identified for compliance testing on Form 802, General Compliance Checklist. The auditor should identify all legally binding restrictions on budget execution, from sources such as appropriation statutes. (The auditor may coordinate the following tests for compliance with the Antideficiency Act with tests of the Statement of Budgetary Resources and with tests of expenses.)		
2. As discussed in FAM 460.03, the auditor should determine whether the summarized budget information (obligations and expenditures) used for compliance tests is reasonably accurate and complete. The auditor may obtain assurance through effective controls that the auditor tests (usually the budget controls) or, if the controls are not effective, through substantive testing of budget amounts for validity, completeness, cutoff, recording, classification, and summarization, as described in FAM 495 B, Example Procedures for Tests of Budget Information. For the accounts listed in step 1, document if the auditor will obtain this assurance by testing controls (as indicated on Form 803, Compliance Summary) or if substantive tests of the budget information are necessary. If the auditor determines that controls are not effective in meeting some or all of the budget control objectives listed in FAM 395 F, Budget Control Objectives, then the auditor should perform substantive tests of the budget amounts (obligations and expenditures), as discussed in FAM 495 B. The auditor should perform substantive tests only for those potential misstatements for which the entity does not have effective budget controls. After the auditor is satisfied as to the reasonableness of the budget amounts to be used for the compliance tests, perform the compliance tests in steps 3 and 4.		

Name of entity: _____

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Audit procedures	Initials/ date	Doc. ref.
3. Compare the actual amounts of recorded obligations and expenditures with the related appropriation or other budget authority listed in step 1. If the entity does not appear to have complied with the provision, then perform step 6. See FAM 803.01, Limitations on Excess Expenditures and Obligations.		
4. Compare timing of legal obligations (contractual or otherwise) with available appropriation or other budget authority listed in step 1. If the entity does not appear to have complied with the provision, then perform step 6. See FAM 803.02, Limitations on Advance Contracting or Other Legal Obligations.		
5. Determine the entity's legally binding level of budget authority (below the appropriation level) that was identified during the planning phase. This level is usually the apportionment level unless the entity has elected a lower level, such as allotments. Compare the amount of actual obligations and expenditures to the legally binding level of restrictions on budget authority identified for compliance testing (the apportionment or allotment level). If the entity does not appear to have complied with the provision, then perform step 6. See FAM 803.03, Limitations on Excess Expenditures and Obligations Related to Apportionments and Allotments.		
6. If the entity does not appear to be in compliance based on the results of tests performed, discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude if noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		

Name of entity: _____

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Audit procedures	Initials/ date	Doc. ref.
7. Contact the entity office responsible for submitting Antideficiency Act (ADA) violations to the President, the Congress, and GAO, and do the following: • obtain a listing of violations for the year under audit; • inquire if all known violations have been included on the list and reported; and • for each ADA violation, determine whether it was reported to the President, the Congress, and GAO.		
8. Check GAO's ADA reporting web page: https://www.gao.gov/legal/appropriations-law/resources (accessed May 29, 2026) to identify and obtain background about ADA violations reported by the entity and compare audit evidence with what the entity reported in ADA violation reports. There may be time lags as to when violations are reported, particularly at year-end.		
9. Document conclusions on compliance with each provision on Form 803, Compliance Summary. Note: The ADA requires that an entity report all violations to the President and the Congress and contemporaneously transmit a copy to GAO. Under implementing guidance in section 145 of OMB Circular No. A-11, *Preparation, Submission and Execution of the Budget*, entity heads must report all ADA violations by transmitting a letter to the President through the Director of OMB (with identical copies sent to the Congress and GAO), and the letter must set forth all the required information. Auditor's judgment is required in determining the impact of these violations and whether these violations constitute reportable noncompliance. For example, if the auditor determines, based on quantitative and qualitative considerations, that an ADA violation does not have a material effect on the financial statements or other financial data significant to the audit objectives, the auditor may conclude that the violation is not reportable noncompliance. The auditor should consult with the entity's legal counsel regarding conclusions on the entity's compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements. There are also additional considerations when the auditor identifies or suspects instances of noncompliance that do not have a material effect on the financial statements or other financial data significant to the audit objectives. See the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580.		

804 – Federal Credit Reform Act of 1990, as Provided in 2 U.S.C. §§ 661–661f

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Federal Credit Reform Act of 1990 (FCRA), as provided in 2 U.S.C. §§ 661–661f, are significant, as indicated on Form 802, General Compliance Checklist. OMB guidance on FCRA is included in OMB Circular No. A-11, *Preparing, Submitting, and Executing the Budget,* part 5, *Federal Credit*.

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
804.01. ADVANCE BUDGET AUTHORITY REQUIRED FOR NEW DIRECT LOAN OBLIGATIONS Provision Type: Quantitative-based. New direct loan obligations may be incurred on or after October 1, 1991, only to the extent that an appropriation or other budget authority is available to cover these costs.[4,5,6,7,8] 2 U.S.C. § 661c(b).	Direct loan obligations made on or after October 1, 1991, do not exceed the available appropriation or other budget authority. (See footnotes 3 through 7 below.)	[Document the control activities that the entity used to achieve the objective.][9]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 804 steps 3 and 4.

[4]A direct loan is a disbursement of funds by the U.S. government to a nonfederal borrower under a contract that requires the repayment of such funds with or without interest. The term also includes the purchase of, or participation in, a loan made by another lender. The term does not include the acquisition of a federally guaranteed loan in satisfaction of default claims or the price support loans of the Commodity Credit Corporation. 2 U.S.C. § 661a(1).

[5]A direct loan obligation is a binding agreement by a federal entity to make a direct loan when specified conditions are fulfilled by the borrower. 2 U.S.C. § 661a(2).

[6]Appropriations or other budget authority to cover the cost of budget obligations for direct loan obligations must be enacted in advance of new direct loan obligations made on or after October 1, 1991. 2 U.S.C. § 661c(b). For revolving or other funds that otherwise would be available for these budget obligations, the Congress must enact a limit on the use of such funds for these purposes to make them available for use.

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Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
804.02. MODIFICATIONS OF OUTSTANDING DIRECT LOANS. Provision Type: Quantitative-based. A direct loan obligation or a direct loan, either of which is currently outstanding, shall not be modified in a manner that increases its cost unless budget authority for the additional cost is available.[10,11,12] 2 U.S.C. § 661c(e).	Modifications made to outstanding direct loan obligations or outstanding direct loans do not exceed the available budget authority. (See footnotes 9 through 11 below.)	Consider pre-testing discussions with OGC.[13]			See Compliance Audit Procedures, FAM 804 step 3.

[7]Costs are defined as the estimated long-term cost to the U.S. government of a direct loan or a related loan modification, calculated on a net present value basis, excluding administrative costs and any incidental effects on governmental receipts or outlays. These calculations are described in further detail under the valuation control objective for obligations in FAM 395 F, Budget Control Objectives. 2 U.S.C. § 661a(5)(A).

[8]There is an exemption from the requirement regarding advance budget authority for entitlements (i.e., mandatory programs) and credit programs of the Commodity Credit Corporation existing on the date of enactment of FCRA (Nov. 5, 1990). 2 U.S.C. § 661c(c).

[9]The auditor should determine the results of the evaluation and testing of budget controls and testing of the Statement of Budgetary Resources. These controls relate to the execution of budget authority and usually are the same controls that are used to comply with the Antideficiency Act and FCRA. Accordingly, additional consideration of controls that achieve the compliance objective generally is not necessary if the auditor has assessed whether the entity achieves all of the budget control objectives listed in FAM 395 F, Budget Control Objective, including the supplemental control objectives for FCRA. The auditor should refer to the budget control evaluation and testing and perform any additional procedures considered necessary to conclude on whether compliance controls are effective.

[10]Appropriations or other budget authority to cover the cost of budget obligations for direct loan obligations must be enacted in advance of new direct loan obligations made on or after October 1, 1991. 2 U.S.C. § 661c(b). For revolving or other funds that otherwise would be available for these budget obligations, the Congress must enact a limit on the use of such funds for these purposes to make them available for use.

[11]Modifications are government actions that alter the estimated cost of an outstanding direct loan (or direct loan obligation) from the current estimate of cash flows. 2 U.S.C. § 661a(9). This includes the sale of loan assets (with or without recourse), as well as any action resulting from new statutes, or from the exercise of administrative discretion under existing law, that directly or indirectly alters the estimating cost of outstanding direct loans (or direct loan obligations). 2 U.S.C. § 661a(9). Thus, the sale of a direct loan, per SFFAS 2, paragraph 53, or a policy change affecting the repayment period or interest rate for a group of existing loans

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Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
804.03. ADVANCE BUDGET AUTHORITY REQUIRED FOR NEW LOAN GUARANTEE COMMITMENTS. Provision Type: Quantitative-based. Loan guarantee commitments may be made on or after October 1, 1991, only to the extent that an appropriation or other budget authority is available to cover these costs.[14, 15,16,17,18] 2 U.S.C. § 661c(b).	Obligations for new loan guarantee commitments made on or after October 1, 1991, do not exceed the available appropriation or other budget authority. (See footnotes 13 through 17 below.)	Consider pre-testing discussions with OGC.[19]			See Compliance Audit Procedures, FAM 804 steps 3 and 4.

would constitute modifications, whereas changes within the terms of existing contracts or through other existing authorities would not be considered modifications. Also, "work outs" of individual loans, such as a change in the amount or timing of payments to be made, would not be considered modifications. The effects of these changes should be included in the annual reestimates of the estimated net present value of the obligations. Permanent indefinite authority is provided by FCRA for these reestimates. 2 U.S.C. § 661c(f).

[12]Prior to performing control or compliance tests, the auditor should discuss with OGC the applicability of this budget restriction related to modification of direct loans or direct loan obligations that were outstanding prior to October 1, 1991.

[13]The auditor should determine the results of the evaluation and testing of budget controls and testing of the Statement of Budgetary Resources. These controls relate to the execution of budget authority and usually are the same controls that are used to comply with the Antideficiency Act and FCRA. Accordingly, additional consideration of controls that achieve the compliance objective generally is not necessary if the auditor has assessed whether the entity achieves all of the budget control objectives listed in FAM 395 F, Budget Control Objective, including the supplemental control objectives for FCRA. The auditor should refer to the budget control evaluation and testing and perform any additional procedures considered necessary to conclude on whether compliance controls are effective.

[14]A loan guarantee is any guarantee, insurance, or other pledge with respect to the payment of all or a part of the principal or interest on any debt obligation of a nonfederal borrower to a nonfederal lender, but does not include the insurance of deposits, shares, or other withdrawable accounts in financial institutions. 2 U.S.C. § 661a(3).

[15]A loan guarantee commitment is a binding agreement by a federal entity to make a loan guarantee when specified conditions are fulfilled by the borrower, the lender, or any other party to the guarantee agreement. 2 U.S.C. § 661a(4).

[16]Appropriations or other budget authority to cover the cost of budget obligations for loan guarantee commitments must be enacted in advance of new loan guarantee commitments made after on or after October 1, 1991. 2 U.S.C. § 661c(b). For revolving or other funds that otherwise would be available for these budget obligations, the Congress must enact a limit on the use of such funds for these purposes to make them available for use.

[17]Costs are defined as the estimated long-term cost to the U.S. government of a loan guarantee or a related loan modification, calculated on a net present value basis, excluding administrative costs and any incidental effects on governmental receipts or outlays. These calculations are described in further detail under the valuation control objective for obligations in FAM 395 F, Budget Control Objectives. 2 U.S.C. § 661a(5)(A).

[18]There is an exemption from the requirement regarding advance budget authority for entitlements (i.e., mandatory programs, such as the Department of Education direct and guaranteed student loan programs and the Department of Veterans Affairs home loan guaranty program) and credit programs of the Commodity Credit Corporation existing on the date of enactment of FCRA (Nov. 5, 1990). 2 U.S.C. § 661c(c).

[19]The auditor should determine the results of the evaluation and testing of budget controls and testing of the Statement of Budgetary Resources. These controls relate to the execution of budget authority and usually are the same controls that are used to comply with the Antideficiency Act and FCRA. Accordingly, additional consideration of controls that achieve the compliance objective generally is not necessary if the auditor has assessed whether the entity achieves all of the budget control objectives listed in FAM 395 F, Budget Control Objective, including the supplemental control objectives for FCRA. The auditor should refer to the budget control evaluation and testing and perform any additional procedures considered necessary to conclude on whether compliance controls are effective.

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Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
804.04. MODIFICATIONS OF OUTSTANDING LOAN GUARANTEES. Provision Type: Quantitative-based. A loan guarantee commitment or a loan guarantee, either of which is currently outstanding, shall not be modified in a manner that increases its cost unless budget authority for the additional cost is available.[20,21,22] 2 U.S.C. § 661c(e).	Modifications made to outstanding loan guarantee commitments or outstanding loan guarantees do not exceed the available budget authority. (See footnotes 19 through 21 below.)	Consider pre-testing discussions with OGC.[23]			See Compliance Audit Procedures, FAM 804 step 3.

[20]Appropriations or other budget authority to cover the cost of budget obligations for loan guarantee commitments must be enacted in advance of new loan guarantee commitments made after on or after October 1, 1991. 2 U.S.C. § 661c(b). For revolving or other funds that otherwise would be available for these budget obligations, the Congress must enact a limit on the use of such funds for these purposes to make them available for use.

[21]Modifications are government actions that alter the estimated cost of an outstanding loan guarantee (or loan guarantee commitment) from the current estimate of cash flows. 2 U.S.C. § 661a(9). This includes the purchase of guaranteed loans, as well as any action resulting from new statutes, or from the exercise of administrative discretion under existing law, that directly or indirectly alters the estimating cost of outstanding loan guarantees (or loan commitments) 2 U.S.C. § 661a(9). Thus, a policy change affecting the repayment period or interest rate for a group of existing loans would constitute a modification, whereas changes within the terms of existing contracts or through other existing authorities would not be considered to be modifications. Also, "work outs" of individual loans, such as a change in the amount or timing of payments to be made, would not be considered modifications. The effects of these changes should be included in the annual reestimates of the estimated net present value of the obligations. Permanent indefinite authority is provided by FCRA for these reestimates. 2 U.S.C. § 661c(f).

[22]Prior to performing control or compliance tests, the auditor should discuss with OGC the applicability of this budget restriction related to modification of loan guarantees or loan guarantee commitments that were outstanding prior to October 1, 1991.

[23]The auditor should determine the results of the evaluation and testing of budget controls and testing of the Statement of Budgetary Resources. These controls relate to the execution of budget authority and usually are the same controls that are used to comply with the Antideficiency Act and FCRA. Accordingly, additional consideration of controls that achieve the compliance objective generally is not necessary if the auditor has assessed whether the entity achieves all of the budget control objectives listed in FAM 395 F, Budget Control Objective, including the supplemental control objectives for FCRA. The auditor should refer to the budget control evaluation and testing and perform any additional procedures considered necessary to conclude on whether compliance controls are effective.

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Federal Credit Reform Act of 1990 (FCRA), as provided in 2 U.S.C. §§ 661–661f, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. OMB guidance on FCRA programs is included in OMB Circular No. A-11, *Preparing, Submitting, and Executing the Budget,* part 5, *Federal Credit*.

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Audit procedures	**Initials/ date**	**Doc. ref.**
1. List the appropriations or other budget authority and the related budget accounts that were identified for compliance testing on Form 802, General Compliance Checklist.		
2. As discussed in FAM 460.03, the auditor should determine whether summarized budget information (obligations and expenditures) used for compliance tests is reasonably accurate and complete. The auditor may obtain assurance through effective controls that the auditor tests (usually the budget controls) or, if the controls are not effective, through substantive testing of budget amounts for validity, completeness, cutoff, recording, classification, and summarization, as described in FAM 495 B, Example Procedures for Tests of Budget Information. For the accounts listed in step 1, document if the auditor will obtain assurance by testing controls (as indicated on Form 804, Compliance Summary) or whether substantive tests of the budget information are necessary. If the auditor determines that controls are not effective in meeting some or all of the budget control objectives listed in FAM 395 F.01 and the supplemental objectives for FCRA listed in FAM 395 F.02, then the auditor should perform substantive tests of the budget amounts (obligations and expenditures), as discussed in FAM 495 B. The auditor should perform substantive tests only for those potential misstatements for which the entity does not have effective budget controls. After the auditor is satisfied as to the reasonableness of the budget amounts to be used for the compliance tests, the auditor should perform the compliance tests in steps 3 and 4.		

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3. For each appropriation or other budget authority listed in step 1, perform the following procedures that are applicable for direct and guaranteed loan programs that have a positive subsidy (i.e., cash outflows exceed cash inflows); for direct and guaranteed loan programs that have a negative subsidy (i.e., cash inflows exceed cash outflows), perform step 4. (a) Compare the amount of obligations for direct loans to the amount of the available appropriation or other budget authority. (Note: This budget restriction is applicable only to obligations for direct loans made on or after October 1, 1991.)		
(b) Compare the amount of obligations for modifications of direct loan obligations or outstanding direct loans to the amount of available budget authority. (Note: The sale of a direct loan is considered a modification. See FAM 804.02, Modifications of Outstanding Direct Loans.) (Discuss applicability of this budget restriction to direct loans and direct loan obligations that were outstanding prior to October 1, 1991, with OGC prior to performing compliance test.)		
(c) Compare the amount of obligations for loan guarantee commitments to the amount of the available appropriation or other budget authority. (Note: This budget restriction is only applicable to obligations for loan guarantee commitments made on or after October 1, 1991.)		
(d) Compare the amount of obligations for modifications of loan guarantee commitments or outstanding loan guarantees to the amount of available budget authority. (Note: Discuss applicability of this budget restriction to loan guarantees and loan guarantee commitments that were outstanding prior to October 1, 1991, with OGC before performing compliance test.) 2 U.S.C. § 661c(b), (e). If the amounts of obligations in any of these comparisons exceed the available budget authority, then the entity may not be in compliance. Perform step 5.		

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4. Compare the total number and dollar volume of loans made to the loan limit in the applicable appropriations statute or other law for direct and guaranteed loan programs that have a negative subsidy (*i.e.,* cash inflows exceed cash outflows). Such programs do not receive an appropriation. However, such programs often have a loan limit that cannot be exceeded, that is, a maximum number of loans that can be made or guaranteed. Perform step 5.		
5. If the entity does not appear to be in compliance based on the results of tests performed, the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude on whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the weaknesses in internal control that allowed the noncompliance to occur, if not previously identified during control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		
6. Document conclusions on compliance with each provision on Form 804, Compliance Summary.		

805 – Federal Debt Collection Authorities, as Provided in 31 U.S.C. Chapter 37

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if the Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37, are significant, as indicated on Form 802, General Compliance Checklist. Implementing regulations on the Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37, are included in 31 C.F.R. Parts 285 and 900-904.

Name of entity: _____ Prepared by: _____

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Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
805.01. INTEREST ON OUTSTANDING DEBT OWED TO THE ENTITY. Provision Type: Transaction-based. Generally, interest shall be charged on an outstanding nontax debt (or claim)[24] owed to the entity. [25,26,27,28] 31 § U.S.C. 3717(a). Normally, interest accrues from the date that the notice of the amount due and interest policies is first mailed to the debtor. 31 U.S.C. § 3717(b). Generally, interest is charged at the rate established by the Secretary of the Treasury that is in effect on that date; further, that rate generally remains fixed for the duration of the indebtedness. 31 U.S.C. § 3717(c).	Interest is properly calculated and charged on past due amounts owed to the entity at the correct rates. (See footnotes 23 through 27 below.)	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 805 steps 3 (a), (b), and (c).

[24]Under the Federal Debt Collection Authorities, a debt is defined as a nontax claim of the U.S. government for money or property from a nonfederal party that has been determined by an appropriate entity official to be due to the U.S. government. 31 U.S.C. § 3701(b). This definition excludes amounts owed to an entity from another federal entity; however, it includes amounts owed for loans insured or guaranteed by the federal government, overpayments, and fines or penalties assessed

by the entity. 31 U.S.C. § 3701(b), (c). In this law, the term debt is used interchangeably with the term claim, and debts covered by this law do not apply to amounts payable under the Internal Revenue Code, the Social Security Act, or tariff laws. 31 U.S.C. § 3701(b), (d).

[25]The entity shall waive the collection of interest on a claim (or any portion of the claim) that is paid within 30 days after the date on which interest began to accrue. 31 U.S.C. § 3717(d). Further, the entity head may extend this 30-day period. 31 U.S.C. § 3717(d). Interest that is either accrued or collected on claims that are paid within the 30-day period would usually not be material or otherwise significant for purposes of compliance testing. If the auditor considers this provision to be significant for compliance testing, then this form should be tailored to include the appropriate testing procedures.

[26]The requirements under 31 U.S.C. § 3717 regarding charging interest on a debt do not apply to the extent that a statute, a regulation required by statute, a loan agreement, or a contract prohibits charging interest or explicitly fixes the interest. 31 U.S.C. § 3717(g)(1). Additionally, these requirements do not apply to a claim under a contract executed before October 25, 1982, that is in effect on October 25, 1982. 31 U.S.C. § 3717(g)(2).

[27]The entity has the authority to waive the collection of interest, penalties, and administrative charges. 31 U.S.C. § 3717(h). To do so, the entity shall prescribe regulations identifying the circumstances that are appropriate for waiving interest collection, and such regulations shall be in conformity with standards prescribed jointly by the U.S. Comptroller General, the U.S. Attorney General, and the Secretary of the Treasury. 31 U.S.C. § 3717(h).

[28]The entity may increase an administrative claim (a debt not based on an extension of government credit through direct loans, guarantees, or insurance, including fines, penalties, and overpayments) annually by the cost of living adjustment in lieu of charging interest and penalties. 31 U.S.C. § 3717(i).

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Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
805.02. ADDITIONAL DEBT-RELATED CHARGES: ADMINISTRATIVE COSTS AND PENALTIES. Provision Type: Transaction-based. The entity shall assess, on a claim owed to it (*i.e.,* a debt), a charge to cover the cost of processing and handling a delinquent claim (administrative costs), which shall be based on the actual costs incurred or upon estimated costs, as determined by the assessing entity. 31 U.S.C. § 3717(e)(1). The entity shall also assess on a claim owed to it a penalty charge (of not more than 6 percent a year) for failure to pay a part of a claim more than 90 days past due. 31 U.S.C. § 3717(e)(2). These additional charges do not accrue interest.[29,30,31] 31 U.S.C. § 3717(f).	Administrative charges and late payment penalties are properly calculated and charged on past due amounts. (See footnotes 28 through 30 below.)				See Compliance Audit Procedures, FAM 805 step 3 (d).

[29]The entity may not assess interest, administrative costs, or penalty charges under 31 U.S.C. § 3717 if a statute, a regulation required by statute, a loan agreement, or a contract prohibits assessing charges or explicitly fixes the charges. 31 U.S.C. § 3717(g).

[30]The entity has the authority to waive the collection of interest, penalties, and administrative charges. 31 U.S.C. § 3717(h). To do so, the entity shall prescribe regulations identifying the circumstances that are appropriate for waiving interest collection, and such regulations shall be in conformity with standards prescribed jointly by the U.S. Comptroller General, the U.S. Attorney General, and the Secretary of the Treasury. 31 U.S.C. § 3717(h).

[31]The entity may increase an administrative claim (a debt not based on an extension of government credit through direct loans, guarantees, or insurance, including fines, penalties, and overpayments) annually by the cost of living adjustment in lieu of charging interest and penalties. 31 U.S.C. § 3717(i).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
805.03. LESS THAN PAYMENT IN FULL: COMPROMISE, TERMINATION, OR SUSPENSION OF CLAIMS. Provision Type: Procedural-based. In general, the entity may compromise, terminate, or suspend claims,[32] which have not been referred to another entity for further collection action, when such claims are not more than $100,000 (excluding interest, penalties, and administrative costs) or such higher amounts as the U.S. Attorney General may prescribe. 31 U.S.C. § 3711(a)(2), (3). Unless otherwise provided by law, claims of more than $100,000 (excluding interest, penalties, and administrative costs) shall be referred to the Department of Justice for compromise, termination, or suspension.[33] 31 C.F.R. § 902.1(b) and § 903.1(b).	Claims of more than $100,000 (excluding interest, penalties, and administrative costs) are referred to the Department of Justice for compromise, termination, or suspension. (See footnotes 31 and 32 below.)				See Compliance Audit Procedures, FAM 805 step 5 (a).

[32]Compromise is the term used when an amount less than the total amount of the claim is accepted by the entity as payment in full. 31 C.F.R. §902.2. Suspension refers to the temporary deferral of collection activities until collection activity is expected to be more successful. 31 C.F.R. § 903.2. Termination refers to stopping of collection activities. 31 C.F.R. § 903.3.

[33]Only the Department of Justice has the authority to compromise, terminate, or suspend collection on claims that are greater than $100,000 (excluding interest, penalties, and administrative charges). Pursuant to 31 C.F.R. § 902.1 and § 903.1, entities generally should use a Claims Collection Litigation Report (CCLR) to refer such matters to the Department of Justice.

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
805.04. ADMINISTRATIVE OFFSET: TREASURY NOTIFICATION AND REFERRAL OF CLAIMS. Provision Type: Procedural-based. In general, if the entity is owed a valid and legally enforceable, nontax debt delinquent over 120 days, and there are no bars to collection, then the entity shall notify Treasury about the debt for administrative offset; and refer the debt to Treasury or a Treasury-designated debt collection center for collection action.[34,35,36,37,38,39] 31 U.S.C. § 3711(g)(1), 31 U.S.C. § 3716(c)(6)(A), and 31 C.F.R. § 285.12(g).	When nontax debt becomes delinquent over 120 days, it is referred to Treasury for administrative offset and collection. (See footnotes 33 through 38 below.)				See Compliance Audit Procedures, FAM 805 step 5 (b).

[34]Before discharging debt owed to the entity, the entity head shall take all appropriate steps to collect such debt, including administrative offset. 31 U.S.C. § 3711(g)(9)(A).

[35]Under implementing Treasury regulations, the 120-day referral requirement applies to all entities relying on Treasury's Bureau of the Fiscal Service to submit debts for administrative offset on the entity's behalf. 31 C.F.R. § 285.12(g). Further, by referring the delinquent debt to Treasury or a Treasury-designated debt collection center, the entity's referral action will satisfy the 120-day notification requirement. 31 C.F.R. § 2815.12(g).

[36]There is no statute of limitation on using administrative offset for debt collection. 31 U.S.C. § 3716(e)(1). Under applicable regulations, however, generally the U.S. government will not use administrative offset for claims collection purposes more than 10 years after the U.S. government's right to collect the claim first accrued. 31 C.F.R. § 901.3(a)(4).

[37]An exception to the Treasury notification and referral requirement of nontax debt delinquent over 120 days for administrative offset is when a statute explicitly prohibits using administrative offset or setoff to collect the type of claim involved. 31 U.S.C. § 3716(e)(2). Also, this section does not prohibit the use of any other existing administrative offset authority. 31 U.S.C. § 3716(d).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
805.05. DENYING FEDERAL FINANCIAL ASSISTANCE TO DELINQUENT DEBTORS. Provision Type: Transaction-based. Unless waived by the entity, a person may not obtain any loan (other than one of the listed exceptions, such as a disaster loan) or loan insurance or guarantee administered by the entity if the person has outstanding nontax delinquent federal debt. 31 U.S.C. § 3720B(a). Delinquency is determined under standards prescribed in implementing Treasury regulations. 31 U.S.C. § 3720B(a).	Loans and loan insurance or guarantees are not granted to persons with delinquent nontax debt.				See Compliance Audit Procedures, FAM 805 step 4 (b).

[38]Before collecting a claim by administrative offset, an entity must adopt regulations on collecting claims by administrative offset, which are be in conformity with the regulations issued jointly by the U.S. Comptroller General, the U.S. Attorney General, and the Secretary of the Treasury. 31 U.S.C. § 3716(b). Such regulations must provide that prior to initiating collection by administrative offset, the entity (1) shall provide written notice to the debtor of (A) the type and amount of the debt, (B) the entity's intention to use administrative offset to collect the debt, and (C) an explanation of the debtor's rights under 31 U.S.C. § 3716; and (2) shall provide the debtor with the opportunity (A) to inspect and copy entity records related to the debt, (B) for a review within the entity of the determination of indebtedness, and (C) to make a written agreement to repay the debt. 31 C.F.R. § 901.3(b)(4).

[39]Exceptions to the requirement to transfer nontax debt delinquent for a period of 120 days to Treasury for collection are (1) a debt or claim that (A) is in litigation or foreclosure, (B) will be disposed of under an asset sales program within 1 year after becoming eligible for sale, or later than 1 year if consistent with an asset sales program and a schedule established by the entity and approved by OMB, (C) has been referred to a private collection contractor for collection for a period determined by Treasury, (D) has been referred by, or with the consent of, Treasury to a debt collection center for a period determined by Treasury, or (E) will be collected under internal offset, if such offset is sufficient to collect the claim within 3 years after the date the debt or claim is first delinquent; and (2) to any other specific class of debt or claim, as determined by Treasury at the request of an entity. 31 U.S.C. § 3711(g)(2) and 31 U.S.C. § 3716(c)(6)(A).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if the Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. Implementing regulations on the Federal Debt Collection Authorities, as provided in 31 U.S.C. chapter 37, are included in 31 C.F.R. Parts 285 and 900-904.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
1. Based on the preliminary assessment of compliance control effectiveness (as documented on Form 805, Compliance Summary), select a statistical sample of amounts owed to the entity during or at the end of the audit period. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D).[40] Sample size _____ Sample selection method _____		
2. For each item selected in step 1, obtain the loan file or other supporting documentation and note the following information as of the date selected for testing: • due date of debt; • amount owed; • date the notice of the amount due and the interest policies is first mailed to the debtor; • amount of interest accrued and other administrative charges and penalties charged, if any; and • number of days the debt is past due, if any. Perform step 3 if the debt is past due. Perform step 4 if the debt is not past due.		

[40]If the auditor uses multipurpose testing for the compliance test and/or compliance control test and/or a substantive test of accounts or loans receivable details, the sample items for the compliance test and/or compliance control test should be selected using the sampling method used for the substantive test as described in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.
As with all sampling applications, the auditor should determine the completeness of the test population. For efficiency, the auditor should use records that were tested for validity, accuracy, and completeness (as well as the other assertions) in conjunction with substantive tests of the population.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
3. If the amount selected is past due: (a) Calculate the number of days that interest should be accrued on the debt as of the date selected for testing. Interest generally accrues from the date that the notice of the amount due is first mailed to the debtor. Compare the auditor's calculation with the entity's calculation and obtain explanation and examine support for any differences. See FAM 805.01, Interest on Outstanding Debt Owed to the Entity.		
(b) Determine the interest rate that should be used to accrue interest on the debt. Unless otherwise established in a contract, in a repayment agreement, or by statute, the rate is the one published in the Federal Register and should be the rate that was in effect on the date that the notice of the amount due was first mailed to the debtor. Compare the auditor's determination of the rate to the rate used by the entity, and obtain explanation and examine support for any differences. See FAM 805.01, Interest on Outstanding Debt Owed to the Entity.		
(c) Calculate the amount of interest that should be owed as of the date selected for testing using the number of days tested in (a) and the interest rate tested in (b). Compare the auditor's calculation to the amount calculated by the entity, and obtain an explanation and examine support for any differences. See FAM 805.01, Interest on Outstanding Debt Owed to the Entity.		
(d) Obtain the entity's schedule of administrative charges and late payment penalties and determine if the appropriate amounts were charged to the debtor. See FAM 805.02, Additional Debt-Related Charges: Administrative Costs and Penalties.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
4. If the debt is not past due, then determine through examination of the entity's records whether (a) interest, administrative charges, or penalties are not being charged and (b) the debtor had no outstanding nontax delinquent federal debt at the time the loan was obtained. See FAM 805.05, Denying Federal Financial Assistance to Delinquent Debtors.		
5. The objectives listed below relate to procedural-based provisions. As discussed in FAM 460.05, the auditor usually performs sufficient procedures in conjunction with tests of compliance controls for these procedural-based provisions to conclude on the entity's compliance without performing additional procedures. The auditor should not perform additional procedures to obtain evidence regarding compliance with the provisions related to the following objectives unless sufficient evidence regarding compliance was not obtained during compliance control tests documented on Form 805, Compliance Summary. (a) Nontax claims of more than $100,000 (excluding interest, penalties, and administrative costs) are referred to the Department of Justice for compromise, termination, or suspension. See FAM 805.03, Less Than Payment in Full: Compromise, Termination, or Suspension of Claims. (b) Unless an exception applies, nontax claims delinquent for a period of 120 days have been referred to Treasury for collection. See FAM 805.04, Administrative Offset: Treasury Notification and Referral of Claims.		
6. If the entity does not appear to be in compliance based on the results of tests performed, the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during control testing;		

Name of entity: _____

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Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
• determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		
7. Document conclusions on compliance with each provision on Form 805, Compliance Summary.		

806 – Prompt Payment Act (PPA), as Provided in 31 U.S.C. Chapter 39

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Prompt Payment Act (PPA), as provided in 31 U.S.C. chapter 39, are significant, as indicated on Form 802, General Compliance Checklist. Implementing regulations for the Prompt Payment Act are included in 5 C.F.R. Part 1315.

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
806.01. INTEREST PENALTIES FOR LATE PAYMENTS. Provision Type: Transaction-based. If payment for property or services[41] from a business concern is not made[42] by the required due date,[43] then an interest penalty[44] shall be paid to the concern on the amount of the payment due.[45] 31 U.S.C. § 3902(a). The interest penalty shall be paid for the period beginning on the day after the required payment date and ending on the date on which payment is made.[46] 31 U.S.C. § 3902(b).	1a. All payments for property or services that are not made by the payment due date are identified. (See note 1.) 1b. Interest penalties are calculated and paid on the past due amount using the appropriate interest rate and period. (See footnotes 40 through 45 below.)	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documenta-tion.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 806 step 4 (a) and (b).

[41]The payment requirement applies for each complete delivered item or each complete service performed. 31 U.S.C. § 3902(a).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
806.02. FUNDING SOURCE FOR LATE PAYMENT INTEREST PENALTIES. Provision Type: Transaction-based. Interest penalties shall be paid out of amounts made available to carry out the programs for which the penalties are incurred.[47] 31 U.S.C. § 3902(f).	2. Interest penalties are paid out of the appropriation account used to pay related program expenditures.				See Compliance Audit Procedures, FAM 806 steps 4 (c), 5 (c), and 6.

[42]A payment is deemed to be made on the date that a check for payment is dated or an electronic transfer is made. 31 U.S.C. § 3901(a)(5).

[43]The required due date is generally the date specified in the contract or, if a date is not specified, 30 days after receipt of a proper invoice. 31 U.S.C. § 3903(a)(1). If payment is for meat or meat food products, perishable agricultural products, dairy products, or construction contracts, then consult with OGC to determine the payment due date. Specific payment due dates to avoid interest penalties are established by law for these items. 31 U.S.C. § 3903(a)(2), (3), (4), (6).

The invoice receipt date is established as the later of (1) the date the entity's designated representative or office actually receives a proper invoice or (2) the 7th day after the date on which, in accordance with the terms and conditions of the contract, the property is actually delivered or performance of the services is actually completed, unless the entity accepted the property or services before the 7th day or a longer acceptance date is specified in the contract. 31 U.S.C. § 3901(a)(4)(A). If the date of actual invoice receipt is not indicated, then the entity must use the invoice date. 31 U.S.C. § 3901(a)(4)(B).

[44]Interest shall be calculated at the rate set by the Secretary of the Treasury under section 12 of the Contract Disputes Act of 1978 (41 U.S.C. § 7109) that is in effect at the time the entity accrues the obligation to pay a late payment interest penalty. 31 U.S.C. § 3902(a). The rates are published in the *Federal Register*. 31 U.S.C. § 3902(a).

[45]The temporary unavailability of funds to make a timely payment due for property or services does not relieve the entity head of the obligation to pay interest penalties under this law. 31 U.S.C. § 3902(d).

[46]An interest penalty not paid after any 30-day period shall be added to the principal amount of the debt, and a penalty accrues thereafter on the combined amount of principal and interest. 31 U.S.C. § 3902(e).

[47]The Prompt Payment Act does not authorize the appropriation of additional amounts to pay a late payment interest penalty. 31 U.S.C. § 3902(f).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
806.03. LIMITATIONS ON DISCOUNT PAYMENTS. Provision Type: Transaction-based. Discounts offered by a business concern may be taken only if payment is made within the specified time as determined from the date of the invoice.[48] An interest penalty shall be paid on improperly taken discounts. 31 U.S.C. § 3904.	3a. Discounts taken after the specified time period are identified. 3b. Interest penalties are properly calculated and paid on the amount of any improperly taken discounts using the appropriate interest rate and period.				See Compliance Audit Procedures, FAM 806 step 5 (a) and (b).

[48]For purposes of this law, a proper invoice for the amount due is an invoice containing or accompanied by substantiating documentation, which the entity head may require by regulation or contract or OMB may require by regulation. 31 U.S.C. § 3901(a)(3).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Prompt Payment Act (PPA), as provided in 31 U.S.C. chapter 39, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. Implementing regulations for the Prompt Payment Act are included in 5 C.F.R. Part 1315.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
1) Based on the preliminary assessment of compliance control effectiveness (as documented on Form 806, Compliance Summary), select a statistical sample of payments from throughout the audit period. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D).[49] Sample size _____ Sample selection method _____		
2) For each item selected in step 1, obtain the supporting documentation for the payment, such as the invoice voucher package. a) Document the following items: • invoice number; • payee; • invoice amount; • invoice date; • invoice receipt date (or other date used for determining compliance with this law—see step 2(b)); • payment date;		

[49]If the auditor uses multipurpose testing for the compliance test and/or compliance control test and/or a substantive test of payments details, the sample items for the compliance test and/or compliance control test should be selected using the sampling method used for the substantive test, as described in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.

As with all sampling applications, the auditor should consider the completeness of the test population. For efficiency, the auditor should consider using records that were tested for validity, accuracy, and completeness (as well as the other assertions) in conjunction with substantive tests of the population.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
• amount of interest penalty paid, if any; • amount of discount taken, if any; and • appropriation account(s) charged for the expenditure and interest penalty, if any.		
b) For each item selected, note whether the payment was made by the required due date. The required due date may be the date specified in the contract or, if a date is not specified, 30 days after receipt of the invoice. If payment is for meat or meat food products, perishable agricultural products, dairy products, or construction contracts, then consult with OGC to determine the payment due date. Specific payment due dates to avoid interest penalties are established by law for these items. See FAM 806.01, Interest Penalties for Late Payments. The invoice receipt date is the later of (1) the date the entity's designated representative or office actually receives a proper invoice or (2) the 7th day after the date on which, in accordance with the terms and conditions of the contract, the property is actually delivered or performance of the services is actually completed (unless the entity accepted the property or services before the 7th day or a longer acceptance period is specified in the contract). If the date of actual invoice receipt is not indicated, then the entity must use the invoice date. See FAM 806.01, Interest Penalties for Late Payments. If the payment was made on or prior to the payment due date, then perform step 3. If the payment was made after the payment due date, then perform step 4. If a discount was taken, then perform step 5.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
3) If the payment was made on or prior to the payment due date, and no discount was taken, then determine that no interest penalty was paid. (Note: If the entity did not take advantage of a discount for which it was eligible or if an interest penalty was paid when it was not owed, then the auditor generally should determine the cause of these items for purposes of reporting findings.)		
4) If the payment was made after the payment due date, then determine whether a) an interest penalty was paid, b) the amount of the interest penalty was properly calculated, and c) the interest penalty was paid out of the appropriation account used to pay the related expenditures. See FAM 806.01, Interest Penalties for Late Payments. Review the accounting codes indicated on the expense voucher. Determine whether the accounting codes used to record the interest penalty are the same as those used for the related expenditure and whether the codes and amounts agree with those recorded in the budgetary accounting records. (See step 6 regarding proper summarization of amounts.) See FAM 806.01, Interest Penalties for Late Payments; and FAM 806.02, Funding Source for Late Payment Interest Penalties. Investigate any differences between the amount of interest penalty calculated by the auditor and the amount paid by the entity, including any instances when an interest penalty was owed but not paid. Investigate any instances when the proper appropriation account was not charged. See FAM 806.01, Interest Penalties for Late Payments.		

Name of entity: _____

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5) If a discount was taken, then determine whether it was taken during the specified period during which the discount was available. If the discount was taken during the specified period, then further consideration is not necessary. If any discounts are taken after the appropriate time period, determine whether a) an interest penalty was paid, b) the amount of the interest penalty was properly calculated, and c) the interest penalty was charged against the appropriation account used for the related expenditures. Review the budget accounting codes indicated on the expense voucher. Determine whether the budget accounting codes indicated on the voucher for the interest penalty are the same as those used for the related expenditure. Determine whether the codes and amounts on the voucher agree with those recorded in the budgetary accounting records. (See step 6 regarding proper summarization of the budgetary amounts.) 31 U.S.C. § 3902 (a), (b), (f), and 31 U.S.C. § 3904. Interest penalties (see FAM 806.01, Interest Penalties for Late Payments) should be calculated on the amount of the discount. The penalty accrues on the amount of the discount from the last date specified that the discounted amount may be paid. See FAM 806.03, Limitations on Discount Payments. Investigate any differences between the amount of interest penalty calculated by the auditor and the amount paid by the entity, including any instances when an interest penalty was owed but not paid. Investigate any instances when the proper appropriation account was not charged.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
6) Consider the procedures performed on the entity's budget controls over summarization of expenditure balances as discussed in FAM 395 F, Budget Control Objectives. If the auditor has assessed the entity's controls as effective in achieving the control objective of summarizing expenditure balances, then further procedures are not necessary to obtain assurance as to whether interest penalties are paid out of the proper appropriation account. If the auditor has assessed the controls as ineffective, then the auditor should perform procedures to determine if the entity has properly summarized the expenditure balances, as described in FAM 495 B, Example Procedures for Tests of Budget Information.		
7) If the entity does not appear to be in compliance based on the results of tests performed, then the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		
8) Document conclusions on compliance with each provision on Form 806, Compliance Summary.		

Note: If the auditor uses multipurpose testing for the compliance test and/or compliance control test and/or a substantive test of payments details, then the sample items for the compliance test and/or compliance control test should be selected using the sampling method used for the substantive test, as described in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.

As with all sampling applications, the auditor should consider the completeness of the test population. For efficiency, the auditor should consider using records that were tested for validity, accuracy, and completeness (as well as the other assertions) in conjunction with substantive tests of the population.

807 – Pay and Allowance System for Civilian Employees, as Provided Primarily in 5 U.S.C. Chapters 51–59

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Pay and Allowance System for Civilian Employees, as provided primarily in 5 U.S.C. chapters 51–59, are significant, as indicated on Form 802, General Compliance Checklist. Implementing regulations issued by the Office of Personnel Management are included in Title 5, U.S. Code of Federal Regulations.

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
807.01. PAY RATE OR SCHEDULE FOR EMPLOYEES IN SPECIFIC POSITIONS. Provision Type: Transaction-based. Pay for employees in a specific position should be based on those employees' appropriate pay schedule or pay rate.[50] These include employees in positions subject to the General Schedule (5 U.S.C. § 5332); prevailing rate employees (5 U.S.C. § 5343); employees in certain senior-level positions, such as specially qualified scientific and professional personnel (5 U.S.C. § 5376); employees appointed to the Senior Executive Service (5 U.S.C. § 5383); and employees paid the minimum wage (29 U.S.C. § 206).	Employees are paid at appropriate rates.	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 807 step 4 (b).

[50]For employees receiving an annual rate of basic pay, calculate the corresponding hourly, daily, weekly, or biweekly rate, by applying the methodology set out in 5 U.S.C. § 5504(b). To derive an hourly rate, divide the annual rate by 2,087; to derive a daily rate, multiply the hourly rate by the number of daily hours of service required; to derive a weekly rate, multiply the hourly rate by 40; and to derive a biweekly rate, multiply the hourly rate by 80. 5 U.S.C. § 5504(b).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Pay and Allowance System for Civilian Employees, as provided primarily in 5 U.S.C. chapters 51–59, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. Implementing regulations issued by the Office of Personnel Management are included in Title 5, U.S. Code of Federal Regulations.

Name of entity: _____ Audit period: _____ Reviewed by: _____		
Audit procedures	**Initials/ date**	**Doc. ref.**
Note: These tests are closely related to procedures performed for substantive tests of payroll expense details, and multipurpose testing in this situation is strongly encouraged.		
1) Based on the preliminary assessment of compliance control effectiveness (as documented on Form 807, Compliance Summary), select a statistical sample of payroll records (e.g., each employee's pay per pay period) throughout the audit period. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D*).*[51] Sample size _____ Sample selection method_____		
2) For each item selected in 1, note the following information: • employee name; • pay period (number and dates); • amount of gross pay for the period; • pay rate; • total hours worked; and		

[51]If the auditor uses multipurpose testing for the compliance test, compliance control test, or both and a substantive test of payroll expense details, then the auditor should select the sample items for the compliance test, compliance control test, or both using the sampling method used for the substantive test, as discussed in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.

As with all sampling applications, the auditor should consider the completeness of the population. For efficiency, the auditor should consider using records that were tested for validity and completeness (as well as the other assertions) in conjunction with substantive tests of payroll or other payroll-related compliance tests.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
• number of hours worked at regular pay and other pay (i.e., overtime, premium pay, etc.).		
3) For each item selected in 1, obtain the employee's personnel file and note the following in effect for the pay period selected: • the employee's grade and step and • the employee's pay rate and pay plan (non-GS employees).		
4) For each item selected in 1, take the following actions: a) Calculate the amount of gross pay using the hours worked and the employee's pay rate indicated on the payroll records. Compare the amount of gross pay calculated by the auditor to the amount shown on the payroll records for the selected pay period, and obtain explanation and examine support for any differences. See FAM 807.01, Pay Rate or Schedule for Employees in Specific Positions. b) Compare the employee's pay rate in the payroll records to the appropriate pay rate for the employee's approved grade and step on the pay schedules established by executive order. (Use the approved grade and step indicated in the employee's personnel records for this test.) Obtain explanation and examine support for any differences between the actual pay rate for the period selected and the authorized amounts. See 5 U.S.C. § 5332 for employees in positions subject to the General Schedule; 5 U.S.C. § 5343 for prevailing rate employees; 5 U.S.C. § 5376 for employees in certain senior-level positions, such as specially qualified scientific and professional personnel; 5 U.S.C. § 5383 for employees appointed to the Senior Executive Service; and 29 U.S.C. § 206 for employees paid the minimum wage. If the employee's pay is not set by these pay schedules, then determine whether the amount paid is properly authorized.		

Note: If the entity outsources payroll processing, then the entity remains responsible for compliance. Dividing responsibility for payroll processing activities between the entity and the service organization could make payroll testing more complicated; however, the auditor should perform the same testing. The auditor may accomplish this testing with the assistance of the service auditor, which may issue an internal control report on the service organization under AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. Another approach may be for the service auditor to assist the entity's auditor by performing agreed-upon procedures at the service organization (e.g., substantive testing) under AT-C 215, *Agreed-Upon Procedures Engagements* (see FAM 710).

808 – Civil Service Retirement Act (CSRA), as Provided in 5 U.S.C. Chapter 83

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Civil Service Retirement Act (CSRA), as provided in 5 U.S.C. chapter 83, are significant, as indicated on Form 802, General Compliance Checklist. Implementing regulations for CSRA's general administration are included in 5 C.F.R. Part 831.

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
808.01. ENTITY WITHHOLDINGS FROM EMPLOYEE PAY FOR RETIREMENT BENEFITS. Provision Type: Transaction-based. For each employee[52] employed prior to January 1, 1984,[53] the entity shall withhold a percentage of the employee's basic pay.[54] 5 U.S.C. § 8334(a)(1).	The appropriate amount is withheld from employees' pay. (See footnotes 52 through 54 below.)	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 808 step 4 (b).

[52]For who qualifies as an employee for purposes of CSRA, see 5 U.S.C. § 8331(1).

[53]Employees employed before January 1, 1984, are generally covered by the Civil Service Retirement Act (CSRA) and on and after that date by the Federal Employees' Retirement System Act (FERSA), although some CSRA employees may have opted for coverage subject to FERSA.

[54]The percentage to be withheld for the service period for (1) most executive branch employees is 7 percent; (2) congressional employees, firefighters, and law enforcement personnel is 7.5 percent; and (3) Members of the Congress is 8 percent. 5 U.S.C. § 8334(a)(1).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
808.02. ENTITY CONTRIBUTIONS FOR EMPLOYEE RETIREMENT BENEFITS. Provision Types: Transaction-based and quantitative-based. An amount equal to the amount withheld from the employee's pay shall be contributed by the entity. 5 U.S.C. § 8334(a)(1). For most employees, the entity contribution shall be paid from the appropriation account or fund used to pay the employee. 5 U.S.C. § 8334(a)(1)(B).	The entity contribution for employee retirement is calculated properly, summarized properly, and charged to the proper appropriation account or fund.				See Compliance Audit Procedures, FAM 808 steps 4 (c) and 5.

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
808.03. DEPOSITS INTO THE CIVIL SERVICE RETIREMENT AND DISABILITY FUND. Provision Types: Procedural-based and quantitative-based. Amounts withheld from employees and the sum contributed by the entity for retirement benefits shall be deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund.[55] 5 U.S.C. § 8334(a)(2).	Withholdings from employees and entity contributions for retirement benefits are properly summarized and deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund.				See Compliance Audit Procedures, FAM 808 steps 6 and 7.

[55]The Civil Service Retirement and Disability Fund is the fund established under 5 U.S.C. § 8348 that is available for the payment of employee benefits (primarily retirement) under 5 U.S.C. chapters 83 and 84 and for specified administrative expenses incurred by Office of Personnel Management (OPM) or the Merit Systems Protection Board. 5 U.S.C. § 8331(5).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Civil Service Retirement Act (CSRA), as provided in 5 U.S.C. chapter 83, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary. Implementing regulations for CSRA's general administration are included in 5 C.F.R. Part 831.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
1. Based on the preliminary assessment of compliance control effectiveness (as documented on Form 808, Compliance Summary), select a statistical sample of payroll records (e.g., each employee's pay per pay period) for the audit period for employees covered by the Civil Service Retirement System (CSRS). See FAM 808.01, Entity Withholdings From Employee Pay for Retirement Benefits. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D).[56] These tests should be coordinated with other tests of payroll-related expenses and with the agreed-upon procedures that entity auditors perform for the Office of Personnel Management (OPM), per OMB audit guidance, if performed. Sample size _____ Sample selection method _____		
2. For each selection made in 1, document the following for the pay period selected: • the amount withheld for the cost of retirement benefits; • the amount of basic pay; and		

[56]If the auditor uses multipurpose testing for the compliance test, compliance control test, or both and a substantive test of payroll expense details, then the auditor should select the sample items for the compliance test, compliance control test, or both using the sampling method used for the substantive test, as discussed in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.

As with all sampling applications, the auditor should consider the completeness of the population. For efficiency, the auditor should consider using records that were tested for validity and completeness (as well as the other assertions) in conjunction with substantive tests of payroll or other payroll related compliance tests.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
• if indicated in the payroll disbursement records, the retirement plan under which the withholdings were made (CSRS or the Federal Employees Retirement System (FERS)). (Only employees covered by CSRS should be included in this compliance test. See FAM 811 for the FERS compliance test.)		
3. For each item selected in 1, obtain the employee's personnel file and note the following: • employee hire date, • amount of basic pay, and • the retirement plan under which the employee is covered.		
4. For each selection made in 1, take the following actions: (a) Compare the amount of basic pay indicated in the employee's personnel file with the amount indicated in the payroll records, and obtain an explanation and examine support for any differences. (This procedure would be performed only if not already performed with other testing.) (b) Calculate the amount of the withholdings for retirement costs based on 7 percent of basic pay for most executive branch employees for the selected pay period and document the amount. Compare to the actual amount withheld for the selected pay period, and obtain an explanation and examine support for any differences. See FAM 808.01, Entity Withholdings From Employee Pay for Retirement Benefits.		
(c) Determine whether the entity contributed an equal amount for the employee's retirement for the selected pay period. Obtain explanation and examine support for any differences between the employee and entity contributions. See FAM 808.02, Entity Contributions for Retirement Benefits.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
5. Determine whether amounts contributed by the entity are charged to the appropriation account or fund used to pay the employee for the selected pay period by performing the following procedures: (a) Review the accounting codes indicated on the supporting documentation. (b) Determine whether the accounting codes used to record the entity contribution are the same as those used for the related payroll expenditure and whether the codes and amounts agree with those recorded in the budgetary accounting records. (This step assumes other payroll testing would have included checking that the codes represent the proper appropriation account.) (c) Consider the procedures performed on the entity's budget controls for summarizing expenditure balances, as discussed in FAM 395 F, Budget Control Objectives. If the auditor has assessed the entity's controls as effective in achieving the control objective of summarization of expenditure balances, then further procedures are not necessary to obtain assurance as to whether the entity's contributions are paid out of the proper appropriation account. If the auditor has assessed the controls as ineffective, then the auditor should perform procedures to determine whether the entity has properly summarized the expenditure balances, as described in FAM 495 B, Example Procedures for Tests of Budget Information. See FAM 808.02, Entity Contributions for Retirement Benefits.		
6. Determine whether the entity has effective internal controls over the proper summarization of (a) the amounts withheld from employees for retirement benefits under the law and (b) the entity contributions for remittance to Treasury. If the entity does not have effective controls for summarization, then test the summarization of the totals that include the items selected for testing in step 1.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
7. Compare the combined totals of employee withholdings and entity contributions that include each selection made in step 1 to the deposit made to Treasury and the remittance sent to OPM, and obtain an explanation and examine support for any differences. The funds should be deposited in the Treasury to the credit of the Civil Service Retirement and Disability Fund. See FAM 808.03, Deposits into the Civil Service Retirement and Disability Fund.		
8. If the entity does not appear to be in compliance based on the results of tests performed, then the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude if noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during compliance control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		
9. Document conclusions on compliance with each provision on Form 808, Compliance Summary.		

Note: If the entity outsources payroll processing, then the entity remains responsible for compliance. Dividing responsibility for payroll processing activities between the entity and the service organization could make payroll testing more complicated; however, the auditor should perform the same testing. The auditor may accomplish this testing with the assistance of the service auditor, which may issue an internal control report on the service organization under AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial*

Reporting. Another approach may be for the service auditor to assist the entity's auditor by performing agreed-upon procedures at the service organization (e.g., substantive testing) under AT-C 215, *Agreed-Upon Procedures Engagements* (see FAM 710).

809 – Federal Employees Health Benefits Act (FEHBA), as Provided in 5 U.S.C. Chapter 89

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Federal Employees Health Benefits Act (FEHBA), as provided in 5 U.S.C. chapter 89, are significant, as indicated on Form 802, General Compliance Checklist.

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
809.01. BIWEEKLY CONTRIBUTIONS FOR EMPLOYEE HEALTH INSURANCE. Provision Type: Transaction-based. In general, for each full-time employee enrolled in a health insurance plan, a biweekly contribution shall be made by the entity[57] in an amount determined by OPM for each type of insurance plan.[58] 5 U.S.C. § 8906(b)(1).	The amount of the entity contribution for health insurance benefits is calculated properly for employees who elect to enroll in a health insurance plan.	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 809 step 4 (b).

[57]The biweekly entity contribution for the employee shall not exceed 75 percent of the health insurance cost. 5 U.S.C. § 8906(b)(2).

[58]For part-time career employees, the biweekly entity contribution shall be calculated on a pro rata basis based on the ratio of number of scheduled part-time hours to the number of scheduled regular hours for an employee serving full-time in a comparable position. 5 U.S.C. § 8906(b)(3).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
809.02. PAYMENT SOURCE FOR ENTITY'S EMPLOYEE HEALTH INSURANCE CONTRIBUTIONS. Provision Types: Transaction-based and quantitative-based. For employees generally, the entity contribution for the cost of health insurance shall be paid from the appropriation account or fund that is used to pay the employee. 5 U.S.C. § 8906(f)(1).	Entity contributions for the cost of employee health insurance are summarized properly and charged to the proper appropriation account or fund.				See Compliance Audit Procedures, FAM 809 step 4 (c).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
809.03. EMPLOYEE PAY WITHHOLDINGS FOR HEALTH INSURANCE. Provision Type: Transaction-based. An amount shall be withheld from the employee's pay to cover the total cost of enrollment in the health insurance plan selected by the employee after the amount of the entity contribution is subtracted. 5 U.S.C. § 8906(d).	Withholdings are made for the employee's share of the cost of health insurance and are calculated properly.				See Compliance Audit Procedures, FAM 809 step 4 (a).
809.04. DEPOSITS INTO THE EMPLOYEES HEALTH BENEFITS FUND. Provision Types: Procedural-based and quantitative-based. Amounts withheld from employees' pay and the sum contributed by the entity for health insurance costs shall be deposited into the Treasury to the credit of the Employees Health Benefits Fund. 5 U.S.C. § 8909(a).	Withholdings from employees' pay and entity contributions for health insurance costs are properly summarized and deposited into the Treasury to the credit of the Employees Health Benefits Fund.				See Compliance Audit Procedures, FAM 809 steps 5 and 6.

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Federal Employees Health Benefits Act (FEHBA), as provided in 5 U.S.C. chapter 89, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
1. Based on the preliminary assessment of compliance control effectiveness (as documented on Form 809, Compliance Summary), select a statistical sample of payroll records (e.g., each employee's pay per pay period) for the audit period. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D)[59] The auditor should coordinate these tests with other tests of payroll-related expenses and with the agreed-upon procedures entity auditors perform for OPM, per OMB audit guidance, if performed. Sample size _____ Sample selection method _____		
2. For each selection made in step 1, document the employee, the pay period selected, and the amount withheld for the pay period selected, if any, for the cost of health insurance. If available, document the health insurance plan enrollment code.		

[59]If the auditor uses multipurpose testing for the compliance test, compliance control test, or both and a substantive test of payroll expense details, then the auditor should select the sample items for the compliance test, compliance control test, or both using the sampling method used for the substantive test, as discussed in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.

As with all sampling applications, the auditor should consider the completeness of the test population. For efficiency, the auditor should consider using records that were tested for validity and completeness (as well as the other assertions) in conjunction with substantive tests of payroll or other payroll related compliance tests.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
3. For each selection made in step 1, obtain the employee's personnel file and note whether the employee elected health insurance coverage for the period to which payroll disbursement relates. Such coverage should be indicated on OPM form SF 2809 or other automated enrollment process. If the employee did not elect health insurance coverage, then ask why amounts are being withheld for the cost of insurance and determine whether any entity contributions are being made inappropriately as well.		
4. If the employee identified in step 3 elected coverage, then perform the following steps: (a) Obtain the schedule of health insurance costs for all plans published by OPM. Using the enrollment code for the plan selected by the employee on OPM form SF 2809 or other automated enrollment process, calculate the employee's portion of the health insurance cost and document it. Compare it to the amount actually withheld for the selected pay period, and obtain an explanation and examine support for any differences. See FAM 809.03, Employee Pay Withholdings for Health Insurance.		
(b) For each employee in (a), determine the appropriate amount of the entity's contribution for its share of health insurance costs by using the OPM schedule of costs. Compare it to the amount actually contributed by the entity for the employee's health insurance for the selected pay period and obtain an explanation and examine support for any differences. See FAM 809.01, Biweekly Contributions For Employee Health Insurance.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
(c) For each employee in (b), determine if amounts contributed by the entity are charged to the appropriation account or fund that is used to pay the employee for the selected pay period by performing the following procedures: i. Review the accounting codes indicated in the supporting documentation. ii. Determine whether the accounting codes used to record the entity contribution are the same as those used for the related payroll expenditure and whether the codes and amounts agree with those recorded in the budgetary accounting records. (This step assumes that other payroll testing would have included checking that the codes represent the proper appropriation account or fund.)		
iii. Consider the procedures performed on the entity's budget controls over summarization of expenditure balances, as discussed in FAM 395 F, Budget Control Objectives. If the auditor has assessed the entity's controls as effective in achieving the control objective of summarization of expenditure balances, then further procedures are not necessary to obtain assurance as to whether the entity's contributions are paid out of the proper appropriation account or fund. If the auditor has assessed the controls as ineffective, then the auditor should perform procedures to determine whether the entity has properly summarized the expenditure balances, as described in FAM 495 B, Example Procedures for Tests of Budget Information. See FAM 809.02, Payment Source for Entity's Employee Health Insurance Contributions.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
5. Determine whether the entity has effective controls over the proper summarization of the amounts withheld from employees for health insurance costs under this law and the entity contributions for remittance to Treasury. If the entity does not have effective controls for summarization, then test the summarization of the totals that include the items selected for testing in step 1.		
6. Compare the total cost of health insurance on the entity's records (employee and employer portions) for the selected pay period to the deposit made into the Treasury and the documentation sent to OPM, and obtain an explanation and examine support for any differences. The funds should be deposited into the Treasury to the credit of the Employees Health Benefits Fund. See FAM 809.04, Deposits into the Employees Health Benefits Fund.		
7. If the entity does not appear to be in compliance based on the results of tests performed, the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during compliance control testing; • determine the impact on the report on internal control over financial reporting (see Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
8. Document conclusions on compliance with each provision on Form 809, Compliance Summary.		

Note: If the entity outsources payroll processing, then the entity remains responsible for compliance. Dividing responsibility for payroll processing activities between the entity and the service organization could make payroll testing more complicated; however, the auditor should perform the same testing. The auditor may accomplish this testing with the assistance of the service auditor, which may issue an internal control report on the service organization under AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. Another approach may be for the service auditor to assist the entity's auditor by performing agreed-upon procedures at the service organization (e.g., substantive testing) under AT-C 215, *Agreed-Upon Procedures Engagements* (see FAM 710).

810 – Federal Employees' Compensation Act (FECA), as Provided in 5 U.S.C. Chapter 81

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Federal Employees' Compensation Act (FECA), as provided in 5 U.S.C. chapter 81, are significant, as indicated on Form 802, General Compliance Checklist.

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
810.01. EMPLOYEES' COMPENSATION FUND COSTS AND ANNUAL BUDGET REQUEST. Provision Type: Procedural-based If the entity is funded by annual appropriations and receives a statement showing the costs of amounts paid from the Employees' Compensation Fund (the Fund),[60] then the entity shall include a request for an appropriation to cover such amounts when submitting its budget request during the next fiscal year.[61] 5 U.S.C. § 8147(b).	The entity's budget request includes a request for an appropriation for any amounts paid by the Fund on the entity's behalf for the prior fiscal year.	[Document the control activities that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documentation.]	[Indicate yes or no; include reference to supporting documentation.] See Compliance Audit Procedures, FAM 810 step 1.

[60]Under FECA, the Employees' Compensation Fund is available without fiscal year limitation to the U.S. government to make compensation payments for the disability or death of an employee resulting from personal injury sustained while in the performance of the employee's duty, unless a statutory exception applies. 5 U.S.C. § 8102(a) and 5 U.S.C. § 8147(a).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
810.02. DEPOSITING FUNDS INTO THE EMPLOYEES' COMPENSATION FUND. Provision Type: Procedural-based. Amounts appropriated pursuant to the request (described in 810.01 above) shall be deposited into the Treasury to the credit of the Fund within 30 days of their availability. 5 U.S.C. § 8147(b). If, however, the entity does not receive annual appropriations and receives a statement showing the costs of amounts paid from the Fund on the entity's behalf, then the entity shall make the required deposit into the Treasury to the credit of the Fund from funds under its control during the first 15 days of October after it receives the Fund cost statement. 5 U.S.C. § 8147(b).	2a. For an entity funded by annual appropriations, the appropriations received for the costs of amounts paid out of the Fund on behalf of the entity are credited to the Fund within 30 days of their availability. 2b. For an entity not funded by annual appropriations, the entity makes the required deposit to the credit of the Fund during the first 15 days of October after it receives the Fund cost statement.				See Compliance Audit Procedures, FAM 810 step 1.

[61]By August 15 of each year, the Secretary of Labor is required to provide the entity a statement showing the total cost of benefits and other payments made from the Employees' Compensation Fund during the preceding July 1 through June 30 expense period on account of the injury or death of employees or individuals under the jurisdiction of the entity. 5 U.S.C. § 8147(b).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Federal Employees' Compensation Act (FECA), as provided in 5 U.S.C. chapter 81, are significant, as indicated on Form 802, General Compliance Checklist. These procedures test compliance with the provisions listed on the Compliance Summary for this law.

Name of entity: _____		
Audit period: _____		
Reviewed by: _____		
Audit procedures	**Initials/ date**	**Doc. ref.**
Note: The provisions identified for testing are procedural-based provisions. As discussed in FAM 460, the auditor usually performs sufficient procedures in conjunction with tests of compliance controls for these procedural-based provisions to conclude on the entity's compliance without performing additional procedures. The auditor should not perform additional procedures to obtain evidence regarding compliance with the provisions related to the following objectives unless sufficient evidence regarding compliance was not obtained during compliance control tests documented on Form 810, Compliance Summary.		
1. Reference to conclusions on compliance controls on Form 810, Compliance Summary, and indicate whether any additional procedures are necessary.		
2. If the entity does not appear to be in compliance based on the results of tests performed, the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during compliance control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
3. Document conclusions on compliance with each provision on Form 810, Compliance Summary.		

811 – Federal Employees' Retirement System Act (FERSA), as Provided in 5 U.S.C. Chapter 84

Note: The auditor should complete this compliance summary or prepare equivalent documentation only if provisions of the Federal Employees' Retirement System Act (FERSA), as provided in 5 U.S.C. chapter 84, are significant, as indicated on Form 802, General Compliance Checklist. Implementing regulations for FERSA's general administration are included in 5 C.F.R. Part 841.

Name of entity: _____	**Compliance Summary**	Prepared by: _____
Audit period: _____		Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
811.01. ENTITY WITHHOLDINGS FROM EMPLOYEE PAY FOR RETIREMENT BENEFITS. Provision Type: Transaction-based. For each employee[62] employed after December 31, 1983,[63] the entity shall withhold a percentage of the employee's basic pay (typically 0.80% of basic pay).[64] 5 U.S.C. § 8422(a)(1).	The appropriate amount is withheld from employees' pay. (See footnotes 61 through 63 below.)	[Document the control techniques that the entity used to achieve the objective.]	[Does control depend on information system processing?]	[Indicate yes or no; include reference to supporting documents.]	[Indicate yes or no; include reference to supporting documents.] See Compliance Audit Procedures, FAM 811 step 4 (b).

[62]For who qualifies as an employee for purposes of FERSA, see 5 U.S.C. § 8401(11).

[63]Employees may be covered by the Civil Service Retirement Act (CSRA) or the Federal Employees' Retirement System Act (FERSA), generally depending on their employment dates. Generally, employees hired after January 1, 1984, are subject to FERSA.

[64]For most employees, the percentage to be withheld is 0.8 percent (7 percent minus the Social Security tax rate imposed by the Internal Revenue Code, 26 U.S.C. § 3101(a)). For congressional employees; Members of the Congress; and law enforcement officers, firefighters, air traffic controllers, and nuclear materials couriers, the withholding rates are higher. See 5 U.S.C. § 8422(a)(1).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
811.02. ENTITY CONTRIBUTIONS FOR EMPLOYEE RETIREMENT BENEFITS. Provision Types: Transaction-based and quantitative-based. The entity shall contribute an amount equal to the employing entity's applicable normal-cost percentage[65] multiplied by the employee's aggregate amount of basic pay payable by the entity. 5 U.S.C. § 8423(a)(1). For most employees, the entity contribution shall be paid from the appropriation account or fund used to pay the employee. 5 U.S.C. § 8423(a)(3).	The entity contribution for employee retirement is calculated properly, summarized properly, and charged to the proper appropriation account or fund. (See footnote 64 below.)				See Compliance Audit Procedures, FAM 811 steps 4 (c) and 5.

[65]The Office of Personnel Management (OPM) calculates the normal-cost percentage, which is statutorily defined at 5 U.S.C. § 8401(23). For example, for fiscal year 2017, it is 14.7 percent of basic pay for most employees. OPM lists the percentages in its benefits administration letters related to cost factors for calculating imputed costs, which is accessible on its website at https://www.opm.gov/retirement-center/publications-forms/benefits-administration-letters/ (accessed May 29, 2026).

Name of entity: _____ Prepared by: _____

Compliance Summary

Audit period: _____ Reviewed by: _____

Provision Description	Objective	Control Activities	IS (Y/N)	Effective controls?	Instances of noncompliance?
811.03. DEPOSITS INTO THE CIVIL SERVICE RETIREMENT AND DISABILITY FUND. Provision Types: Procedural-based and quantitative-based. Amounts withheld from employees and the sum contributed by the entity for retirement benefits shall be deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund.[66] 5 U.S.C. § 8422(c).	Withholdings from employees and entity contributions for retirement benefits are properly summarized and deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund.				See Compliance Audit Procedures, FAM 811 steps 6 and 7.

[66]The Civil Service Retirement and Disability Fund is the fund established under 5 U.S.C. § 8348 that is available for the payment of employee benefits (primarily retirement) under 5 U.S.C. chapters 83 and 84, and for specified administrative expenses incurred by OPM or the Merit Systems Protection Board. 5 U.S.C. § 8401(6).

Note: The auditor generally should perform these procedures or prepare equivalent documentation only if provisions of the Federal Employees' Retirement System Act (FERSA), as provided in 5 U.S.C. chapter 84, are significant, as indicated on Form 802, General Compliance Checklist. These procedures are designed to test compliance with the provisions listed on the Compliance Summary. Implementing regulations for FERSA's general administration are included in 5 C.F.R. Part 841.

Name of entity: _____		
Audit period: _____		
Reviewed by: _____		
Audit procedures	**Initials/ date**	**Doc. ref.**
1. Based on the preliminary assessment of compliance control effectiveness (as documented on Form 811, Compliance Summary), select a statistical sample of payroll records (e.g., each employee's pay per pay period) for the audit period for employees covered by the Federal Employees Retirement System (FERS) established pursuant to FERSA. See FAM 811.01, Entity Withholdings from Employee Pay for Retirement Benefits. The sample size will vary based on the expected effectiveness of compliance controls, as discussed in FAM 460.02. Document the sampling approach (see example documentation in FAM 495 D).[67] The auditor should coordinate these tests with other tests of payroll-related expenses and with the agreed-upon procedures entity auditors perform for OPM, per OMB audit guidance, if performed. Sample size _____ Sample selection method _____		

[67]If the auditor uses multipurpose testing for the compliance test, compliance control test, or both and a substantive test of payroll expense details, then the auditor should select the sample items for the compliance test, compliance control test, or both using the sampling method used for the substantive test, as discussed in FAM 430, Design Tests. Otherwise, the auditor should select items using attribute sampling, as discussed in FAM 460.02.

As with all sampling applications, the auditor should consider the completeness of the test population. For efficiency, the auditor should consider using records that were tested for validity and completeness (as well as the other assertions) in conjunction with substantive tests of payroll or other payroll related compliance tests.

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	**Initials/ date**	**Doc. ref.**
2. For each selection made in 1, document the following for the pay period selected: • the amount withheld for the cost of retirement benefits; • the amount of basic pay; and • if indicated in the payroll disbursement records, the retirement plan under which the withholdings were made (the Civil Service Retirement System (CSRS) or FERS). (Only employees covered by FERS should be included in this compliance test. See FAM 808 for the CSRS compliance test.)		
3. For each item selected in 1, obtain the employee's personnel file and note the • employee hire date, • amount of basic pay, and • retirement plan under which the employee is covered.		
4. For each selection made in 1, complete the following: (a) Compare the amount of basic pay indicated in the employee's personnel file with the amount indicated in the payroll records, and obtain an explanation and examine support for any differences. (This procedure would be performed only if it were not already performed as part of other testing.)		
(b) Calculate the amount of the withholdings for retirement costs based on 0.8 percent of basic pay for most employees for the selected pay period and document the amount. Compare to the actual amount withheld for the selected pay period, and obtain an explanation and examine support for any differences. See FAM 811.01, Entity Withholdings from Employee Pay for Retirement Benefits.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
(c) Determine whether the entity contributed the correct amount for the employee's retirement for the selected pay period. Obtain an explanation and examine support for any differences between the entity contributions and the amount calculated using OPM's normal-cost percentage. See FAM 811.02, Entity Contributions for Employee Retirement Benefits.		
5. To determine if amounts contributed by the entity are charged to the appropriation account or fund used to pay the employee for the selected pay period, complete the following: (a) Review the accounting codes indicated on the supporting documentation. (b) Determine whether the accounting codes used to record the entity contribution are the same as those used for the related payroll expenditure and whether the codes and amounts agree to those recorded in the budgetary accounting records. (This step assumes other payroll testing would have included checking that the codes represent the proper appropriation account.) (c) Consider the procedures performed on the entity's budget controls over summarizing expenditure balances, as discussed in FAM 395 F, Budget Control Objectives. If the auditor has assessed the entity's controls as effective in achieving the control objective of summarizing expenditure balances, then further procedures are not necessary to obtain assurance as to whether the entity's contributions are paid out of the proper appropriation account. If the auditor has assessed the controls as ineffective, then the auditor should perform procedures to determine whether the entity has properly summarized the expenditure balances, as described in FAM 495 B, Example Procedures for Tests of Budget Information. See FAM 811.02, Entity Contributions for Employee Retirement Benefits.		

Name of entity: _____

Audit period: _____

Reviewed by: _____

Audit procedures	Initials/ date	Doc. ref.
6. Determine whether the entity has effective controls over the proper summarization of the amounts withheld from employees for retirement costs under this law and the entity contributions for remittance to Treasury. If the entity does not have effective controls for summarization, then test the summarization of the totals that include the items selected for testing in step 1.		
7. Compare the combined totals of employee withholdings and entity contributions that include each selection made in step 1 to the deposit made to Treasury and the remittance sent to OPM, and obtain explanation and examine support for any differences. The funds should be deposited into the Treasury to the credit of the Civil Service Retirement and Disability Fund. See FAM 811.03, Deposits into the Civil Service Retirement and Disability Fund.		
8. If the entity does not appear to be in compliance based on the results of tests performed, the auditor should discuss these matters with OGC and, when appropriate, the Special Investigator Unit to conclude whether noncompliance actually occurred and the implications of such noncompliance. For any noncompliance noted, the auditor should • identify the control deficiencies that allowed the noncompliance to occur, if not previously identified during compliance control testing; • determine the impact on the report on internal control over financial reporting (see the Internal Control subsection in FAM 580); • consider the implications on the financial statements; and • report instances of noncompliance, as appropriate (see the Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements and Instances of Fraud subsection in FAM 580).		
9. Document conclusions on compliance with each provision on Form 811, Compliance Summary.		

Note: If the entity outsources payroll processing, then the entity remains responsible for compliance. Dividing responsibility for payroll processing activities between the entity and the service organization could make payroll testing more complicated; however, the same testing should be performed. The auditor may accomplish that testing with the assistance of the service auditor, which may issue an internal control report on the service organization under AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. Another approach may be for the service auditor to assist the entity's auditor by performing agreed-upon procedures at the service organization (e.g., substantive testing) under AT-C 215, *Agreed-Upon Procedures Engagements* (see FAM 710).

SECTION 900

Substantive Testing Implementation Guidance

Contents of Substantive Testing Implementation Guidance

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902 – Intragovernmental Activity and Balances

.01 This section provides guidance on the procedures that the auditor should perform with respect to intragovernmental activity (i.e., costs and revenues) and balances (i.e., assets and liabilities). The U.S. government in its entirety is an economic entity and federal entities are components of that entity. Therefore, transactions between federal entities are considered intragovernmental. Within the U.S. government, many federal entities rely on other federal entities to help them achieve their missions and fulfill their operating objectives. These arrangements may be voluntary, stipulated by law, or established by mutual agreement of the entities involved. Note that activity and balances of the General Fund of the U.S. Government (General Fund)[1] are intragovernmental and are therefore addressed in FAM 902 and 921.

In many cases, the entity receiving goods or services reimburses the providing entity in accordance with an agreed-upon price, which may or may not represent fair value. However, frequently one entity provides goods or services to another entity free of charge (without reimbursement), and the cost of such activity is paid with the providing entity's appropriated funds. For example, the General Services Administration routinely provides property management services and contract award and administration services to other entities without charge.

.02 Intragovernmental amounts represent activity and balances both *within* a federal entity and *between* federal entities. "Intra-entity" amounts are intragovernmental activity and balances within a federal entity (any federal agency, department, administration, or government corporation that is not part of a larger financial reporting entity other than the government as a whole). "Inter-entity" amounts are intragovernmental activity and balances between two federal entities that are trading partners. Intra-entity amounts and inter-entity amounts constitute intragovernmental activity and balances.

Although the Federal Accounting Standards Advisory Board (FASAB) has used various terms for intragovernmental amounts, it has predominately used "intra-entity" and "inter-entity" (as defined above), including in key intragovernmental pronouncements.[2] In addition, Office of Management and Budget (OMB) reporting guidance[3] uses "intra-entity" and "inter-entity." In line with FASAB and OMB, the FAM uses "intra-entity" and "inter-entity" to refer to the two types of intragovernmental amounts.

.03 Inter-entity intragovernmental differences have specific terminology. These differences occur when federal trading partners do not record the same transaction in the same time period for the same amount. Differences, if unresolved, are errors in the U.S. government's consolidated financial

[1]The General Fund of the U.S. Government is a component of the Department of the Treasury's central accounting function. It is a stand-alone reporting entity that comprises the activities fundamental to funding the federal government (e.g., issued budget authority cash activity, and debt financing activities).

[2]See Statement of Federal Financial Accounting Standards (SFFAS 4)*, Managerial Cost Accounting Concepts and Standards,* and SFFAS 55, *Amending Inter-entity Cost Provisions*.

[3]OMB reporting guidance in OMB Circular No. A-136, *Financial Reporting Requirements*, is updated annually. Users should refer to the OMB reporting guidance applicable to the current financial audit.

statements. At the entity level, intragovernmental amounts need to be *reconciled* with trading partners, and then any resulting differences need to be *resolved*. The terms used for intragovernmental differences are as follows:

a. Reconciliation

- **Reconciled difference**: the reason for the difference and its dollar amount is known and identified.
- **Unreconciled difference**: the reason for the difference and its dollar amount is not known and identified.

b. Resolution

- **Resolved difference**: the difference is reconciled and an adjustment was made to correct accounting records resulting in the difference no longer existing.
- **Unresolved difference**: a difference is reconciled; however, no adjustment was made to correct accounting records resulting in the difference continuing to exist.

.04 Common examples of intragovernmental activity include the following:

a. goods and services provided from one federal entity to another (trade transactions);

b. transfers between entities based on statutory authority (including transfers pursuant to agreements authorized by statute), expended appropriations, taxes and fees collected, collections for others, accounts receivable from appropriations, transfers payable, and custodial revenue;

c. investments in federal securities issued by the Department of the Treasury's Bureau of the Fiscal Service (Fiscal Service), including interest accruals, interest income and expense, and amortization of premiums and discounts;

d. borrowings from Fiscal Service and the Federal Financing Bank, including interest accruals, interest income, and expenses;

e. costs of litigation paid by the Treasury Judgment Fund;[4]

f. transactions with the Office of Personnel Management (OPM) relating to employee benefit programs, such as the Federal Employees' Retirement System, Civil Service Retirement System, and federal employees' life insurance and health benefits programs, that include routine payments, imputed financing, and accruals; and

g. transactions with the Department of Labor relating to the Federal Employees' Compensation Act (FECA) that include routine payments to the department.

[4]A permanent, indefinite appropriation, commonly known as the Judgment Fund, is available to pay final judgments, settlement agreements, and certain types of administrative awards against the United States, and interest and costs specified in the judgments or otherwise authorized by law, when payment is not otherwise provided for. The Secretary of the Treasury certifies all payments from the fund. (See 31 U.S.C. § 1304, Judgments, awards, and compromise settlements.) FASAB Interpretation No. 2 clarifies how federal entities report the costs and liabilities arising from claims to be paid by the Judgment Fund and how the Judgment Fund accounts for the amounts that it is required to pay on behalf of federal entities.

.05 Without proper and timely reconciliation of intragovernmental activity and balances and resolution of intragovernmental differences, differences in these account balances could materially affect the balances at both the entity level and government-wide level. Entities should perform timely reconciliations of intragovernmental transactions with trading partners, as annual or quarterly reconciliations may not be sufficient to detect and resolve differences promptly.

.06 When preparing its financial statements, the entity eliminates intra-entity intragovernmental amounts. When preparing the U.S. government's consolidated financial statements, Treasury eliminates intra-entity and inter-entity intragovernmental amounts. In cases where intragovernmental accounts are significantly out of balance, entities and Treasury may not be able to eliminate intragovernmental amounts from the entities' and the U.S. government's consolidated financial statements, respectively.

Accounting and Reporting Information

FASAB Standards

.07 The *FASAB Handbook of Federal Accounting Standards and Other Pronouncements, as Amended* (FASAB Handbook) contains the body of accounting concepts and standards for the U.S. government. Some of the Statements of Federal Financial Accounting Standards (SFFAS) that address intragovernmental activity and balances include SFFAS 4, 5, and 7, which are briefly discussed below. Auditors should refer to the FASAB Handbook for additional information related to intragovernmental activity and balances.

.08 SFFAS 4, *Managerial Cost Accounting Standards and Concepts*, and related interpretations address the accounting standards for inter-entity cost activity. SFFAS 5, *Accounting for Liabilities of the Federal Government*, addresses inter-entity liabilities, including federal debt, pensions, and retirement benefits. SFFAS 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, as amended, addresses inter-entity revenue and requires disclosure of the nature of intragovernmental exchange transactions in which an entity provides goods or services at a price less than full cost or does not charge a price at all.

.09 In accordance with SFFAS 4, as amended by SFFAS 55, *Amending Inter-entity Cost Provisions,* reporting entities' costs are to incorporate the full cost of goods and services received from other entities, although there is flexibility for reporting imputed costs for non-business type activities.[5] With the exception of imputed inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements or as otherwise directed by OMB, imputed inter-entity costs for non-business type activities are not required to be recognized. Although not required to do so, an entity may still elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs related to non-business type activities. The entity providing the goods or services has the responsibility to provide the receiving entity with information on the full cost of services either through billing or other means. The reporting entities are also to consult with the

[5]Business-type activity is defined as a significantly self-sustaining activity which finances its continuing cycle of operations through collection of exchange revenue as defined in SFFAS 7.

funding and administering agencies, such as OPM, for information needed to properly record inter-entity costs. See OMB reporting guidance for examples of inter-entity costs that should be recognized.[6]

OMB Reporting Guidance

.10 OMB reporting guidance states that in their audited financial statements, federal entities are to

- report intragovernmental assets separately from assets associated with the Federal Reserve, government-sponsored enterprises,[7] and other entities not considered to be consolidation entities[8] (which would include organizations and individuals considered to be part of the general public);
- report intragovernmental liabilities separately from claims against the entity by the Federal Reserve, government-sponsored enterprises, and other entities not considered to be consolidation entities (which would include organizations and individuals considered to be part of the general public); and
- disclose intragovernmental amounts separately from other amounts for (1) nonentity assets (held by but not available to the entity), (2) other assets, (3) liabilities not covered by budgetary resources, and (4) other liabilities.

In addition, OMB reporting guidance states that

- federal entities are to reconcile intragovernmental balances and transactions with trading partners and resolve any identified differences, throughout the fiscal year and at year-end, with the goal of resolving all differences prior to final submission of data for the U.S. government's consolidated financial statements, and
- federal entities significant to the U.S. government's consolidated financial statements are to use a standardized balance sheet and include a note in their audited financial statements showing how line items in the financial statements relate to line items in the U.S. government's consolidated financial statements, including intragovernmental line items that are later eliminated in compiling the U.S. government's consolidated financial statements.[9]

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[6]In accordance with OMB reporting guidance, unreimbursed costs that reporting entities are required to recognize include (1) employees' pension and postretirement health and life insurance benefits; (2) other postemployment benefits for retired, terminated, and inactive employees, which include unemployment and workers compensation under the Federal Employees' Compensation Act (5 U.S.C. chapter 81); and (3) losses in litigation proceedings (addressed in FASAB Interpretation No. 2, *Accounting for Treasury Judgment Fund Transactions*). For employee benefits, the imputed cost is the difference between employer and employee contributions and the total cost of the benefit.

[7]A government-sponsored enterprise is statutorily established with its particular attributes defined in its enabling statute and federal charter. Despite this diversity, there are at least four readily observable characteristics of government-sponsored enterprises: (1) private sector ownership, (2) limited competition, (3) activities limited by federal charter, and (4) chartered privileges that create an inferred federal guarantee of obligations (see FASAB Handbook, app. E).

[8]Consolidation entities are entities that are consolidated in the U.S. government's consolidated financial statements.

[9]See TFM vol. 1, pt. 2, ch. 4700 (TFM 2-4700), for a listing of federal entities identified as significant to the U.S. government's consolidated financial statements (significant entities). Significant entities that are Financial Accounting Standards Board reporters need to also report this note information and have it audited. Such information may be

Treasury Financial Manual

.11 The *Treasury Financial Manual* (TFM), volume 1, part 2, chapter 4700 (TFM 2-4700), *Federal Entity Reporting Requirements for the Financial Report of the United States Government*, primarily section 4750, provides extensive, detailed information on how federal entities are to properly account for, reconcile, and report intragovernmental activity and balances (and resolve intragovernmental differences).[10] The TFM has various requirements for federal entities, including the following:

- Use the *United States Standard General Ledger* (USSGL) account attributes and domains to indicate the nature of account balances and to identify intragovernmental transactions. For example, the federal (i.e., intragovernmental) "F" attribute used in conjunction with USSGL account data enables Fiscal Service to prepare elimination entries for the government-wide financial statements.
- Add trading partner information to each USSGL account sent to Treasury when the USSGL account has the federal attribute "F."[11]
- Perform various actions throughout the year, including reporting intragovernmental data to Treasury, providing explanations to Treasury for the entities' inter-entity intragovernmental differences, and working with trading partners to resolve differences.

In addition to requirements, the TFM includes instructions for fulfilling requirements, including instructions for

- addressing recurring intragovernmental differences by identifying root causes and implementing corrective action plans to resolve the root causes,
- submitting intragovernmental differences to Treasury's dispute resolution process when entities cannot resolve intragovernmental differences with trading partners, and
- submitting year-end information to Treasury for inclusion in the U.S. government's consolidated financial statements.

The TFM also includes various aids, including

- appendixes dedicated to explaining the proper recording of intragovernmental transactions for investments and borrowings, benefits, buy/sell, transfers, custodial and non-entity transactions, and the General Fund;
- USSGL supplements providing guidance on accounting for transactions using standard accounts, including crosswalks indicating how the entities' year-end information (which is submitted to Treasury) should be classified at the entity level and reported in the U.S. government's consolidated financial statements; and

reported by the significant entity in (i) its annual financial report within a note to the financial statements, (ii) a limited use audited financial statements as a note to the financial statements, or (iii) an audited note (an audit of a special element similar to a closing package).

[10]The TFM is available at https://tfx.treasury.gov/tfm (accessed May 29, 2026).

[11]Trading partners are federal agencies, departments, or entities participating in transactions with each other.

- various tables listing federal entity identification codes, types of transactions per reciprocal category, USSGL accounts per reciprocal category, and authoritative sources for some transaction types.[12]

Management Representations

.12 To emphasize entity management's responsibility for identifying intragovernmental transactions and balances and resolving inter-entity differences, intragovernmental representations are included in two year-end representations: (i) the management representation letter (which is provided for the audits of the entity's financial statements) and (ii) the CFO Representations for Intragovernmental Activity and Balances form (which is provided to the entity's IG, Fiscal Service, and GAO).

The management representation letter includes both intragovernmental and non-intragovernmental representations. The intragovernmental representations include those for intra-entity intragovernmental eliminations, proper accounting and disclosure of transactions, and resolution (or inability to resolve) of inter-entity intragovernmental transactions with trading partners. Note that if the auditor believes that such representation is not supported by management, the auditor should assess the effect of the inadequate disclosure on the auditor's opinion (see FAM 1001).

.13 The CFO Representations for Intragovernmental Activity and Balances form includes

- intragovernmental representations regarding the consistency between the information the entity submits to Treasury for consolidation and the sources of that information,
- inter-entity intragovernmental activity and balances with specific trading partners,
- the independent auditor's proposed adjustments,
- the CFO's monitoring of inter-entity intragovernmental differences throughout the year, and
- the existence and assessment of internal controls over intragovernmental activity and balances (see TFM 2-4700, Appendix 4).

G-Invoicing and Intragovernmental Payment and Collection System (IPAC)

.14 G-Invoicing is the primary method most federal entities use to bill and pay for services and supplies within the U.S. government electronically. G-Invoicing is used to communicate to Treasury and the trading partner that the online billing or payment for services and supplies has occurred. G-Invoicing is intended to be a control federal entities can use to reconcile their intragovernmental transactions

[12]Reciprocal accounts are offsetting USSGL accounts used by inter-entity trading partners to record transactions (e.g., a seller's receivable account and a buyer's corresponding payable account). Treasury groups these USSGL accounts into "reciprocal categories," which Treasury uses to help manage intragovernmental transactions, including calculating intragovernmental differences between trading partners, assisting entities in resolving differences, and at year-end eliminating intragovernmental amounts from the U.S. government's consolidated financial statements.

associated with the buying and selling of goods and services with other federal entities.

.15 The servicing entity initiates a transaction within G-Invoicing to indicate that goods or services have been delivered or performed. The requesting entity initiates a transaction within G-Invoicing to indicate that goods or services were received and accepted. Once agreed-upon actions are complete within G-Invoicing, G-Invoicing facilitates payment for goods and services through the IPAC system.

.16 As with non-intragovernmental collections and payments, federal entities should record increases and decreases to their Fund Balance with Treasury (FBWT) accounts for IPAC collections and payments, respectively. IPAC information is reported to Treasury's Central Accounting Reporting System (CARS), which provides FBWT account statements and other reports to federal entities. Regular reconciliation of entity FBWT records with Treasury records is a control activity related to maintaining the accuracy and reliability of entity FBWT records; additional guidance for auditing FBWT is provided in FAM 921.

Audit Procedures

.17 The following are summary narrative descriptions of intragovernmental audit procedures. For examples of intragovernmental audit procedures, see FAM 902 A.

.18 The auditor should assess inherent risk and control risk for risks of material misstatement due to fraud or error. For example, inherent risk may exist because of the nature of the intragovernmental activity, such as a significant volume or dollar amount of transactions, number of trading partners, or complexity of transactions.

.19 The auditor should consider the risk of material misstatement in determining the nature, extent, and timing of control testing and substantive procedures for auditing intragovernmental activity and balances and evaluating the results of these procedures. Throughout the audit, the auditor evaluates the possible existence of material intragovernmental activity and balances that could affect the financial statements. The auditor also evaluates information concerning material intragovernmental activity and balances to determine the adequacy and appropriateness of note disclosures.

.20 The auditor generally should determine an intragovernmental materiality benchmark because combining all the accounts may distort the auditor's judgment when designing the nature, extent, and timing of audit procedures. In determining the materiality benchmark, the auditor should decide how to handle significant intragovernmental balances (such as funds with the U.S. Treasury, U.S. Treasury securities, and inter-entity balances) and offsetting balances (such as future funding sources that offset certain liabilities and collections that are offset by transfers to other government entities) due to their levels of risk (see FAM 230).

.21 In gaining an understanding of the entity, including its internal control, the auditor should obtain an understanding of management responsibilities and the relationship of each component within the entity to the total entity (i.e., intra-entity amounts) and of the entity to other federal entities (i.e., inter-entity amounts). This includes knowledge of

- the entity's trading partners;
- the nature of intragovernmental transactions that occur;
- the volume and dollar amount of transactions;
- management's attitude about and awareness of reconciliations of intragovernmental activity and balances and the resolution of intragovernmental differences with trading partners; and
- the entity's operations to identify, respond to, and resolve accounting and auditing problems.

.22 The auditor should obtain an understanding of the following general phases of intragovernmental accounting and reporting:

a. ***Identifying*** and ***recording*** intragovernmental transactions.

b. ***Reconciling*** the entity's records of intragovernmental activity and balances and ***resolving*** intragovernmental differences (i.e., make adjustments so that the difference no longer exists) after appropriately researching the difference, and/or completing corrective actions that fixed the cause of the difference, or after Treasury issued a decision as part of its dispute resolution process. Entities should:

- Coordinate with trading partners to reconcile intragovernmental activity and balances.
- Resolve differences by either recording an adjustment in the entity's accounting records **OR** verifying that the trading partner recorded an adjustment in its accounting records.

c. ***Reporting*** intragovernmental activity and balances in the entity financial statements **AND** to Treasury for inclusion in the U.S. government's consolidated financial statements (the entity's intra-entity and inter-entity intragovernmental amounts are eliminated).[13] Entities include intragovernmental activity and balances in the automated trial balance submissions to Treasury sent via the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS). OMB reporting guidance also requires significant entities to use a standardized balance sheet and include a note to the financial statements, titled *Reclassification of Financial Statement Line Items for Financial Report Compilation Process*, as discussed in the Accounting and Reporting Information: OMB Reporting Guidance subsection above.

.23 For all three general phases of intragovernmental accounting and reporting, the auditor should assess the design of control activities, and for control activities that have been designed and implemented effectively, test their operating effectiveness. This begins with the auditor identifying policies and procedures related to the entity's ability to record, process, summarize, and report intragovernmental activity and balances by trading partner. A good design emphasizes the importance of identifying and classifying intragovernmental

[13]There may be valid reasons to not eliminate certain intra-entity intragovernmental amounts from an entity's financial statements. In such instances, the entity should communicate with Treasury in order for any needed journal entries to be recorded for the U.S. government's consolidated financial statements.

transactions by trading partner when they are initiated and on all documentation thereafter. Without this initial identification, the entity's financial management system may not be able to adequately track intragovernmental activity and balances.

.24 The auditor should design audit procedures to understand whether the entity uses other collection and payment methods (e.g., electronic funds transfer, checks, standard forms used to transfer funds between appropriations, and credit cards) in addition to the IPAC system to process intragovernmental activity and balances. The auditor should determine whether these methods affect the accuracy of intragovernmental activity and balances.

.25 If the auditor determines that the entity's reconciliation and resolution controls for intragovernmental transactions are not designed or implemented effectively, the auditor should consider the effect on the risk of material misstatement, the effect on substantive testing procedures, and whether to report a significant deficiency or material weakness in internal control. Where intragovernmental transactions are or could be material, significant additional work is usually necessary to express an unmodified opinion. In cases where the auditor finds significant deficiencies or material weaknesses in the intragovernmental resolution control and no other mitigating controls exist, the auditor must disclose this in the report or opinion on internal controls (FAM 580).

.26 The auditor may detect misstatements during testing of intragovernmental transactions (i.e., a transaction was recorded with an incorrect amount) and testing of the entity's reconciliation and resolution of intragovernmental differences. The *reconciled* intragovernmental differences are those for which the entity determined its cause but did not yet *resolve* the difference; therefore, the difference still exists at year-end. The unresolved intragovernmental differences are those for which

- the entity appropriately researched and reconciled the difference with its trading partner; however, no adjustment was made to correct either the entity's or the trading partner's accounting records resulting in the difference continuing to exist or
- Fiscal Service, as part of its dispute resolution process, may issue a decision in which the entity or the trading partner is to adjust its accounting records; however, this adjustment has not been made.

The auditor should document misstatements in the summary of uncorrected misstatements (see FAM 540 and FAM 595 C).

.27 To avoid duplicate procedures, the auditor should consider other intragovernmental related work (including FBWT) when designing the tests for intragovernmental activity and balances. Examples of audit procedures for the audit of intragovernmental activity and balances are in FAM 902 A. The audit procedures generally are customized by the auditor for the particular entity. For example, if the auditor determines that the intragovernmental accounts receivable line item is significant, the auditor generally should prepare separate audit procedures for this line item. In addition, for efficiency, the auditor may coordinate tests of intragovernmental activity and balances with tests of nonfederal activity and balances.

902 A – Example Audit Procedures for Intragovernmental Activity and Balances

Note: See FAM 902.02 for definitions of intragovernmental terms.

Procedures	Initials/ date	Doc. ref.
I. PLANNING Obtain an understanding of the entity and its operations, including its internal control, that are significant to intragovernmental activity and balances (FAM 220). 1) Inquire of entity management about the following: a) The relationship of each unit within the entity to the total entity and of the entity to other entities. b) Management's attitude and awareness of entity operations and internal controls with respect to intragovernmental accounting and reporting. c) Three general phases of intragovernmental accounting and reporting: i. ***Identifying*** and ***recording*** intragovernmental activity and balances; ii. ***Reconciling*** the entity's records of intragovernmental activity and balances to those reported by trading partners and ***resolving*** intragovernmental differences (i.e., make adjustments so that differences no longer exist) after appropriately researching the difference, and/or completing corrective actions that fixed the cause of the difference, or after Treasury issued a decision as part of its dispute resolution process by: • coordinating with trading partners to reconcile intragovernmental activity and balances; and • recording an adjustment in the entity's accounting records **OR** verifying that the trading partner recorded an adjustment in its accounting records; and iii. ***Reporting*** intragovernmental data in the entity financial statements **AND** to Treasury for inclusion in the U.S. government's consolidated financial statement (the entity's intra-entity and inter-entity intragovernmental amounts are eliminated). Note that		

Procedures	Initials/ date	Doc. ref.
• for reporting to Treasury, entities include intragovernmental activity and balances in the automated trial balance submissions sent via the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS); • Office of Management and Budget (OMB) reporting guidance[14] requires significant entities to use a standardized balance sheet and include a note in their audited financial statements titled *Reclassification of Financial Statement Line Items for Financial Report Compilation Process*; and • reconciliation and resolution, described in ii. above, should occur prior to reporting to Treasury.		
2) Obtain an understanding of significant accounting and auditing issues relevant to intragovernmental activity and balances by reading the entity's prior year's performance and accountability report or agency financial report. a) Review the prior year auditors' reports. b) Review prior year-end intragovernmental differences reported by Treasury.[15] c) Review journal vouchers recorded by Treasury during the prior year-end process for the U.S. government's consolidated financial statements and determine whether (i) the underlying differences are still outstanding, (ii) authorized entity personnel approved the journal vouchers, and (iii) these journal vouchers will impact current year audit procedures.[16]		

[14]OMB reporting guidance in OMB Circular No. A-136, *Financial Reporting Requirements*, is updated annually. Users should refer to the OMB reporting guidance applicable to the current financial audit.

[15]Quarterly, Treasury generates and provides to entities various documents that report intragovernmental differences. Treasury provides entities with differences over established thresholds with Material Difference Reports (MDR), on which an entity provides Treasury explanations for its differences and provides significant entities with a scorecard containing metrics. Treasury also provides a concluding report that provides details (including the entities' explanations) on all the significant differences (Comparative Status of Disposition Report, CSDR), and a spreadsheet that breaks down differences to the USSGL level (IGT Raw Data File). Entities work with their trading partners and use the CSDR and the IGT Raw Data File to reconcile intragovernmental amounts (research) and resolve resulting differences before the start of the next quarterly cycle.

[16]During the year-end consolidation process for the U.S. government's financial statements, Treasury analyzes intragovernmental differences calculated to identify those that it can resolve by booking journal vouchers (JV). Doing so, Treasury changes the audited data the entities sent to it, which lessens the total intragovernmental differences

Procedures	Initials/ date	Doc. ref.
3) Identify the entity's accounting and reporting requirements for intragovernmental activity and balances such as by reading the following: a) Applicable Federal Accounting Standards Advisory Board (FASAB) standards; OMB reporting guidance; and *Treasury Financial Manual*, volume 1, part 2, chapter 4700 (TFM 2-4700), *Federal Entity Reporting Requirements for the Financial Report of the United States Government* (FR).		
b) Entity policies and procedures covering the general accounting and reporting phases (see I.1.c above), including internal controls.		
4) To identify material line items, accounts, note disclosures, and classes of transactions; and applicable assertions; for intragovernmental activity and balances, perform the following procedures: a) Ask entity management to identify the following: i. The names of all intragovernmental trading partners, related contracts and agreements, and the volumes and dollar amounts of intragovernmental activity and balances with each trading partner.		
ii. The nature and terms of all significant intragovernmental activity and balances.		
iii. The intragovernmental differences that Treasury reported to the entity, are in Treasury's dispute resolution process, or are being addressed by corrective actions that the entity is implementing.		
b) Review vendor and customer master file listings, major contracts, and G-Invoicing/IPAC activity for intragovernmental trading partners to determine whether trading partner codes and other document identifiers are used in accordance with TFM chapter 4700 appendix 5.		
5) To identify the systems or methods for the processing, accounting, and financial reporting of intragovernmental activity and balances, perform the following procedures: a) Interview the entity's key management about processes, for example, the systems or methods that are used to process intragovernmental activity and		

reported in the U.S. government's consolidated financial statements. Treasury generally contacts the entities prior to making the JVs.

Procedures	Initials/ date	Doc. ref.
balances for each audit cycle (e.g., G-Invoicing, IPAC, credit cards, standard forms used to transfer funds between appropriations, etc.).		
b) Consider coordinating this work with the audit of like nonfederal (i.e., non-intragovernmental) activity and balances (i.e., similar transactions by the entity with parties other than other federal entities).		
6) Determine and document the intragovernmental materiality benchmark, materiality, and performance materiality, which are separate from those calculated for the financial statement audit (FAM 230).		
7) Document the material line items, accounts, note disclosures, and classes of transactions; applicable assertions; identified risks of material misstatement, and inherent risk assessments on the line item risk analysis (LIRA) form (FAM 395 H) or equivalent.		
II. INTERNAL CONTROL Identify relevant control activities and determine whether they have been implemented (see FAM 350). A relevant control activity is an effectively designed control activity the auditor plans to test, that if implemented and operating effectively, would achieve specific control objectives that address identified risks of material misstatement at the assertion level. Audit procedures to help identify relevant control activities (existence, completeness, valuation, rights and obligations, presentation, and disclosure) are listed below per the general intragovernmental accounting and reporting phases. Note: Each general phase should include appropriate, effective controls (including documented policies and procedures). Without proper and timely reconciliation of intragovernmental activity and balances and resolution of intragovernmental differences, differences in these account balances could materially affect the balances at both the entity level and government-wide level. Consequently, a control objective is the timely resolution of intragovernmental differences (control objectives are documented in the specific control evaluation (SCE) worksheet discussed later).		
Phase I: Identifying and recording intragovernmental activity and balances		
1) Determine, through inquiries of management, walk-throughs, reviews of prior years' documentation, and the following procedures, how the entity identifies and records intragovernmental amounts. a) Determine whether management reviews the current OMB, Treasury, and other guidance for identifying and recording intragovernmental activity and balances and updates the entity's policies and procedures, such as by i. complying with the *U.S. Standard General Ledger* (USSGL) at the transaction level by recording (1) the intragovernmental (i.e., federal) attribute "F," (2) one of the intragovernmental domains ("F,"		

Procedures	Initials/ date	Doc. ref.
"G," or "Z"), and (3) the trading partner identifier code (TFM 2-4700), and ii. using the correct reciprocal USSGL account categories in TFM 2-4700.[17]		
b) Determine whether the entity (i) identifies trading partners when transactions are initiated and on all documentation thereafter and (ii) reviews and approves the trading partner codes before they are entered into the system.		
c) Determine *when* the entity recognizes intragovernmental transactions and what controls are designed and implemented effectively to reasonably assure that the entity recognizes the transactions in the same period, and uses the same accounting methodology, as its trading partner.		
Phase II: ***Reconciling entity's records of intragovernmental activity and balances to those reported by trading partners and resolving intragovernmental differences (i.e., making adjustments so that differences no longer exist) after appropriately researching the difference, and/or completing corrective actions that fixed the cause of the difference, or after Treasury issued a decision as part of its dispute resolution process. Entities should:*** • ***Coordinate with trading partners to reconcile intragovernmental activity and balances, and*** • ***Resolve differences by either recording an adjustment in the entity's accounting records OR verifying that the trading partner recorded an adjustment in its accounting records.***		
2) Determine, through inquiries of management, walk-throughs, reviews of prior years' documentation, and the following procedures, how the entity reconciles its intragovernmental amounts with its trading partners.		
a) Determine whether the entity has established processes, including routine communication and confirmations, with each trading partner to reconcile intragovernmental activity and balances timely.		
b) Determine whether management reviews the current OMB, Treasury, and other guidance for		

[17]Reciprocal accounts are offsetting USSGL accounts used by inter-entity trading partners to record transactions (e.g., a seller's receivable account and a buyer's corresponding payable account). Treasury groups these USSGL accounts into "reciprocal categories," which Treasury uses to help manage intragovernmental transactions, including calculating intragovernmental differences between trading partners, assisting entities in resolving differences, and at year-end eliminating intragovernmental amounts from the U.S. government's consolidated financial statements (TFM 2-4700, appendices 2 and 3).

Procedures	Initials/ date	Doc. ref.
reconciling intragovernmental activity and balances and updates the entity's policies and procedures.		
c) Determine how often the entity reconciles its intragovernmental amounts with its trading partners (OMB reporting guidance requires reconciliation throughout the year). Note: For the reasons discussed at the beginning of section II: Internal Control, in addition to differences that are significant to the entity, the entity should also work with trading partners to *reconcile* differences that are *only* significant to the trading partner (i.e., not significant to the entity).		
d) Determine whether the entity maintains a current listing of its trading partners and monitors its reconciliation with those trading partners in order to assess the entity's performance in timely reconciling with its trading partners.		
e) Determine whether entity accountants and managers review journal vouchers recorded by Treasury during the prior year-end process for the U.S. government's consolidated financial statements to determine whether (i) these differences are still outstanding and (ii) entity internal controls need to be improved so that intragovernmental information sent to Treasury eliminates in consolidation.		
f) Determine whether the entity reviews the quarterly intragovernmental differences reported by Treasury, and reports to Treasury explanations for its differences.		
g) Determine whether management reviewed and approved the reasons for any differences identified and tracked, including any explanations reported to Treasury.		
3) Determine, through inquiry of management, walk-throughs, reviews of prior years' documentation, and the following procedures, how the entity resolves intragovernmental differences.		
a) Determine whether the entity has established processes to resolve intragovernmental differences timely (OMB reporting guidance requires resolution of differences throughout the year with differences resolved by year-end).		

Procedures	Initials/ date	Doc. ref.
Note: In addition to differences that are significant to the entity, the entity should also work with trading partners to *resolve* differences that are only significant to the trading partner (i.e., not significant to the entity).		
b) Determine whether management reviews the current OMB, Treasury, and other guidance for resolving intragovernmental activity and balances and updates the entity's policies and procedures.		
c) Determine whether the entity maintains a current listing of its differences and whether management monitors it to assess the entity's performance in timely resolving differences.		
d) Determine whether management identifies and approves adjustments before adjusting the accounting records. If the trading partners agree that an adjustment is required in the trading partner's records, document what procedures management has to confirm that the trading partner agrees to record the adjustment.		
Phase III: Reporting intragovernmental activity and balances Note: This phase includes entity financial reporting, GTAS reporting, and reviews of GTAS generated reclassified financial statements, which are produced by GTAS using the automated trial balance information submitted by the entities. Significant entities should use the standardized balance sheet and include a *Reclassification of Financial Statement Line Items for Financial Report Compilation Process* note in audited financial statements in accordance with OMB reporting guidance. Significant entities that are FASB reporters need to also report the note information and have it audited (see TFM 2-4705.25). Treasury uses this information to calculate the differences between trading partners on a quarterly basis (which the entities then need to resolve).		
4) For each audit cycle, determine, through inquiries of management, walk-throughs, reviews of prior years' documentation, and the following procedures, the entity's policies and procedures for reporting intragovernmental activity and balances.		
a) Determine whether the entity has established processes for ensuring appropriate inclusion of intragovernmental activity and balances in its financial statements.		
b) Determine whether the entity has established processes for ensuring appropriate reporting of intragovernmental activity and balances to Treasury for inclusion in the U.S. government's consolidated financial statements.		
c) Determine whether management reviews the current FASAB, OMB, Treasury, and other		

Procedures	Initials/ date	Doc. ref.
guidance for reporting intragovernmental activity and balances and updates the entity's policies and procedures.		
d) Determine whether the entity has designed and implemented effective information system controls over reporting processes such as to reasonably assure that only appropriate personnel have access to financial reporting systems including GTAS and have appropriate roles assigned.		
e) Determine how the entity eliminates intra-entity activity from its consolidated financial statements. Also, determine whether i. the entity generates year-end reports of all the intra-entity intragovernmental amounts to be eliminated from the entity's financial statements, and ii. management reviews and approves the results of the procedures.		
f) Determine whether procedures, such as reconciliations (matching the data submitted to Treasury to the entity's general ledger and/or subsidiary ledgers), are performed to ensure that the intragovernmental data included in the agency financial report or performance and accountability report and sent to Treasury and are accurate and complete.		
g) Determine the entity's processes for reviewing its reclassified financial statement information from GTAS and preparing the note linking line items on the entity's financial statements to line items on the U.S. government's consolidated financial statements.		
i. For entities following the standardized balance sheet, perform observations and review the entity's documentation (policies, directives, and procedures) for control activities for (i) using the USSGL chart of accounts and financial statement crosswalk and (ii) deriving the GTAS adjusted trial balance submissions from audited data.		
ii. For significant component entities that either did not (i) use the standardized balance sheet or (ii) present funds from dedicated collections using the table provided in OMB reporting guidance, determine whether the entity appropriately included a reclassification table		

Procedures	Initials/ date	Doc. ref.
for the balance sheet in the reclassification note and perform step iii.		
iii. For the reclassification note, perform observations and review the entity's documentation (policies, directives, and procedures) for control activities for (i) using the USSGL crosswalk to link accounting data to the GTAS trial balance, (ii) deriving the GTAS trial balance from audited data, (iii) ensuring the entity's financial statements are accurately reflected on the left side of the reclassification note, (iv) verifying that the entity's reclassified statement amounts are accurately reflected on the right side of the reclassification note, and (v) reconciling the reclassified statements to the entity's financial statements (i.e., the right side to the left side of the note).		
h) Determine whether management reviews and approves the results of the procedures done to assess the reports in "f" and "g" above for accuracy and completeness.		
i) Determine whether the entity has developed processes for resolving differences in year-end activity and balances as part of its year-end reporting process. Note: The status of entity efforts for phase II is important to consider as part of the year-end reporting process. Differences in amounts reported by trading partners through IPAC, GTAS, or other system should be resolved by year-end. Information from these systems, including the GTAS raw data file, are available to entities. However, Treasury year-end scorecards for significant entities are not available until after year-end reporting deadlines.		
j) Determine whether management reviews and approves the results of procedures in "i" above.		
Other		
5) Coordinate with other audit cycles to determine if the entity has internal control deficiencies related to intragovernmental activity and balances, including intragovernmental differences. For example, coordinate with the FBWT audit to determine if the entity has		

Procedures	Initials/ date	Doc. ref.
issues on its FBWT/IPAC reconciliation, such as material unresolved differences.		
6) Prepare or update the following documents or equivalent: a) Cycle memorandum (FAM 390). b) SCE worksheets (FAM 395 G) to document the identification of relevant control activities and whether they have been implemented. Note: The SCE worksheets are later updated with the results of testing control activities for operating effectiveness. c) LIRA forms (FAM 395 H) to document the assessment of control risk and risk of material misstatement. Note: The auditor should assess the risks of material misstatement in determining the nature, extent, and timing of control testing and substantive procedures for auditing intragovernmental activity and balances and in evaluating the results of these procedures.		
III. TESTING If the auditor preliminarily determines that the relevant control activities have been implemented, the auditor should test them to determine whether they are *operating effectively*. These procedures should be performed on an interim and year-end basis. However, if the auditor preliminarily determines that relevant control activities have *not* been implemented, the auditor should determine the effect on substantive testing procedures and whether to report a significant deficiency or material weakness in internal controls in the audit report. When intragovernmental activity and balances are material, significant additional work may be necessary to express an unmodified opinion on the financial statements. Note: Listed below are possible testing procedures. Select procedures that test the control activities found to be designed and implemented effectively. In addition, determine *when* during the year to perform the procedures.		
Phase I: Identifying and recording intragovernmental activity and balances		
1) Test relevant control activities in Phase I that have been implemented. a) Review interagency (i.e., inter-entity) agreements and test an audit sample of transactions to determine whether they are recorded in the general ledger in the proper period and with the proper dollar amount, trading partner code, domain, attribute, and USSGL account.		

Procedures	Initials/ date	Doc. ref.
b) Test an audit sample of intragovernmental activity and balances to determine whether they are recorded in the general ledger in the proper period and with the proper dollar amount, trading partner code, domain, attribute, and USSGL account. This includes sending confirmations to the trading partners to corroborate the existence, validity, and accuracy of the intragovernmental amounts.		
c) Reconcile intragovernmental amounts in the general ledger, by trading partner and reciprocal category, to those in subsidiary ledgers.		
d) Review all JV adjustments recorded from the point of the signed interagency agreement until liquidation of the obligation or unfilled customer order.		
<u>The following phase I procedures are done only at year-end</u> e) If misstatements are found (per above procedures), evaluate the effects on the financial statements and auditor's reports in accordance with FAM 540 and accumulate misstatements in accordance with FAM 595 C. This is also noted at the end of phase III.		
f) Determine if there are unrecorded transactions and if the transactions are recorded in the correct period by doing the following: i. Coordinating with the FBWT portion of the audit to review results of the FBWT reconciliation tests. ii. Searching for unrecorded revenue, accounts receivable, purchases, and accounts payable. For example, select invoices XX days after year-end and trace to shipping records (or evidence of service performance). Determine whether the revenue and accounts receivable were recorded in the correct period. Alternatively, select invoices from shipping records to trading partners prior to year-end and trace to invoices. Also, to test the completeness of amounts recorded as accounts payable at the balance sheet date, select disbursements after the end of the audit period and test whether the amounts were recorded in payables.		

Procedures	Initials/ date	Doc. ref.
Phase II: ***Reconciling entity's records of intragovernmental activity and balances to those reported by trading partners and resolving intragovernmental differences (i.e., making adjustments so that differences no longer exist) after appropriately researching the difference, and/or completing corrective actions that fixed the cause of the difference, or after Treasury issued a decision as part of its dispute resolution process. Entities should:*** • ***coordinate with trading partners to reconcile intragovernmental activity and balances and*** • ***resolve differences by either recording an adjustment in the entity's accounting records OR verifying that the trading partner recorded an adjustment in its accounting records.*** Exhibit I to FAM 902 A provides an illustration of a tool that may be used to summarize reconciling items and prove amounts between a buyer and a seller entity.		
2) Test relevant control activities in Phase II that have been implemented. a) Review evidence that the entity identified intragovernmental amounts and then contacted each trading partner to reconcile intragovernmental amounts. i. Determine whether each trading partner was contacted and intragovernmental amounts were compared in order to identify differences. ii. Consider sending confirmations to significant trading partners to corroborate the existence, validity, and accuracy of the intragovernmental amount recorded by the entity.		
b) For intragovernmental differences identified, determine whether the entity performed timely research to determine the reasons for the differences. When the entity is the receiver of the activity, contact trading partners for supporting documentation to confirm the balances. (Note: OMB reporting guidance requires reconciliation throughout the year with all differences resolved by year-end.) If differences were not reconciled (i.e., the reasons for the differences were not identified), determine why.		
c) Review evidence of management's monitoring of the timely reconciliation of differences to determine whether management's monitoring is effective.		
d) For intragovernmental differences identified in Treasury quarterly reconciliations of GTAS submissions, determine whether the entity researched		

Procedures	Initials/ date	Doc. ref.
the differences, including contacting trading partners and Treasury as needed, to determine the reasons for the differences. i. Review and re-perform the entity's procedures to ensure that the intragovernmental differences reports from Treasury were accurate and complete. ii. Review the explanations that the entity provided Treasury to determine whether they were reasonable and supported. iii. Verify that the explanations were timely provided to Treasury (per the schedule in the TFM 2-4700). iv. Verify that management reviewed and approved the results of the procedures in "i" and "ii" above. v. Participate in the significant entity's teleconferences with Treasury to discuss the entity's draft scorecard, paying particular attention to matters regarding reconciliation and the identification of causes of differences.		
e) Use auditor judgment to conclude whether the entity effectively worked with trading partners to reconcile differences.		
3) For any intragovernmental differences identified, determine whether the differences were timely resolved by either (i) recording an adjustment in the entity's accounting records and/or (ii) verifying that the trading partner recorded an adjustment in its accounting records. (Note: OMB reporting guidance requires resolution of differences throughout the year with all differences resolved by year-end.) If differences were not resolved by year-end, determine why.		
a) Verify that management reviewed and approved the adjustments before adjusting the accounting records.		
b) Trace, from the source documents to the general ledger, the adjustments that resolved differences.		
c) Review the evidence of management's monitoring of the timely resolution of differences to determine whether management's monitoring is effective.		
d) Use auditor judgment to conclude whether the entity effectively worked with trading partners to resolve differences.		

Procedures	Initials/ date	Doc. ref.
Phase III: Reporting intragovernmental activity and balances		
4) Test relevant control activities in Phase III that have been implemented. a) Determine whether the entity appropriately summarized intragovernmental activity and balances in its financial statements in accordance with relevant U.S. GAAP, OMB, and Treasury guidance.		
b) Obtain a list of the entity's year-end **intra-entity** intragovernmental amounts identified for elimination and verify for each that		
i. an eliminating journal entry was done and		
ii. management reviewed and approved the journal entry prior to booking the adjustment.		
c) Read FASAB and OMB reporting guidance to determine the requirements for reporting intragovernmental information in the entity's financial statements. Review the information to determine whether the entity complies.		
d) Reconcile the intragovernmental data submitted to Treasury to the entity's general ledger and/or review and re-perform other procedures the entity performed to ensure that the data sent to Treasury was accurate and complete.		
e) Verify that the results of the procedures in "a" and "d" above were reviewed and approved by management.		
f) Verify that entity personnel that accessed financial reporting systems, including Treasury's GTAS, to report the entity's intragovernmental data were (i) authorized by the entity to do so and (ii) have role descriptions that include this work.		
g) If the entity determines that it has recurring or permanent differences with its trading partner (for example, due to a difference in accounting methodology), inquire of management how it communicates this information to Treasury.		
Other		
5) At the conclusion of interim testing, based on the results of testing, reassess the risk of material misstatement and the overall audit assurance needed, then revise audit procedures. If material weaknesses or other significant		

Procedures	Initials/ date	Doc. ref.
deficiencies are identified, consider their implications on this risk assessment.		
6) Analytical procedures: After completing the tests of details, perform analytical procedures to determine whether balances are reasonable and reflect appropriate activity. For example, take the following actions: a) Develop expectations of the accounts payable and receivable balances overall or for all significant trading partners in light of the payment cycle during the year. Then compare these to the recorded balances and investigate differences in the recorded balances. b) Develop expectations of recorded intragovernmental revenue overall or for all significant trading partners based on independent data. Then compare these to the recorded amounts and investigate differences in the recorded balance. c) Examine accounting records for large, unusual, or nonrecurring activity or balances.		
7) The auditor may detect misstatements during testing of intragovernmental activity and balances (i.e., in phase I, a transaction was recorded with an incorrect amount) and testing of the entity's reconciliation or resolution of inter-entity intragovernmental differences. (That is, in phase II, the reconciled intragovernmental differences are those for which the entity determined cause but did not yet resolve the differences; therefore, the differences still exist at year-end. The reconciled yet unresolved intragovernmental differences that are misstatements are those differences for which • the entity appropriately researched and reconciled the difference with its trading partner, but no adjustment was made to accounting records, resulting in the difference continuing to exist, or • Treasury's Bureau of the Fiscal Service, as part of its dispute resolution process, may issue a decision in which the entity or its trading partner is to adjust its accounting records; however, this adjustment has not been made.) The auditor should evaluate the effects of misstatements on the financial statements and auditor's reports in accordance with FAM 540 and accumulate misstatements in accordance with FAM 595 C.		
8) Read the entity's financial statements and notes and compare the reported intragovernmental activity and balances with the test results.		

Procedures	Initials/ date	Doc. ref.
9) Communicate with trading partner entities' auditors (with entity permission) to determine whether issues these auditors identified affect the auditor's conclusions on intragovernmental transactions.		
10) Summarize the results and propose any adjusting entries (FAM 595 C).		
11) Conclude on whether intragovernmental activity and balances have been adequately accounted for and properly disclosed in the financial statements.		
12) For journal vouchers identified by Treasury, perform the following. a) For journal vouchers identified by Treasury in the prior year, verify that the entity this year (i) determined why Treasury, and not the entity, was able to resolve the differences and (ii) fixed the causes of these differences so that these differences will not exist at the end of this year. b) For journal vouchers that may be proposed by Treasury this year, verify that the entity has procedures to ensure that the personnel the entity identified to review and approve Treasury's proposed journal vouchers are (i) authorized by the entity to do so and (ii) sufficiently knowledgeable and "senior" to make such a decision.		

Reconciliation of Seller Entity Intragovernmental Earned Revenue with Buyer Entity Cost — **Exhibit I**

Seller Entity – Trading Partner 1	
Intragovernmental funds received for each revenue, FY 20XX, From Trading Partner 2 (General Ledger before adjustment)	$200,000
Less adjustment for timing difference	
Funds received but revenue unearned at end of the current year	(20,000)
Add adjustment for timing difference	
Earned revenue recognized on unbilled work at the end of the current year	50,000
Intragovernmental earned revenue – accrual basis, FY 20XX, from Trading Partner 2 (General Ledger after adjustment)	**$230,000**
When reconciled, Seller Revenue and Buyer Cost must agree after adjustments are recorded to correct for errors.	
Buyer Entity – Trading Partner 2	
Intragovernmental purchases – cash basis, FY 20XX, from Trading Partner 1 (General Ledger before adjustment)	$190,000
Add:	
Adjustment for cutoff error identified during reconciliation process (funds sent to Trading Partner 1 but not recorded)	10,000
Adjustment for completed but unbilled work at the end of the current year	50,000
Less:	
Funds paid in the current year, but amount prepaid at end of current year	(20,000)
General ledger after adjustment for Trading Partner 1	**230,000**
Less:	
Reconciling item for purchases inventoried at end of the current year	(50,000)
Intragovernmental purchases included in cost – accrual basis, FY 20XX, from Trading Partner 1	**$180,000**

The contra accounts for timing items should also reconcile.

The Seller's unearned revenue account (liability) should reconcile with the Buyer's prepaid (asset) account.

The Seller's earned but unbilled receivable (asset) should reconcile with the Buyer's accounts payable for unbilled work (liability) account.

When reconciled and adjusted, Seller Revenue and Buyer Cost may not agree because of timing differences. This difference should be resolved by year-end.

903 – Auditing Cost Information

.01 FAM 903 provides general guidance for auditors on identifying cost information and planning audit procedures. The auditor should coordinate these procedures with procedures for auditing various line items and accounts. The auditor is generally concerned about cost information for the following reasons:

a. The auditor should obtain sufficient evidence to determine whether costs are presented fairly in entity financial statements and are appropriately classified by designated program and net cost component (e.g., gross cost, earned revenue, and gain/loss from changes in assumptions). In addition, the auditor should determine whether costs are properly classified between intragovernmental and non-intragovernmental in the entity's accounting records. Proper classification of costs at the entity level contribute to proper classification of costs in the consolidated financial statements of the U.S. government.

b. For CFO Act agencies, the auditor must evaluate whether agency financial management systems comply substantially with the three requirements of FFMIA, including applicable federal accounting standards, such as cost accounting standards.

c. Although the auditor does not opine on the MD&A, cost information is important to the MD&A, particularly as it relates to developing performance measures. The relevant accounting standard for cost information is SFFAS 4, *Managerial Cost Accounting*, as amended by SFFAS 55, *Amending Inter-entity Cost Provisions*. These standards are relevant both to external financial reporting and to cost information for internal management reporting.

The Effect of SFFAS 4 and SFFAS 55

.02 SFFAS 4, as amended by SFFAS 55, establishes the concepts and standards for providing reliable and timely information on the full cost of federal programs, their activities, and outputs. The objectives of managerial cost information specified in SFFAS 4 are as follows:

a. To provide program managers with relevant and reliable information relating costs to outputs and activities. With this information, program managers should understand the costs of the activities they manage. The cost information should assist them in improving operational efficiency.

b. To provide relevant and reliable cost information to assist the Congress and executives in making decisions about allocating federal resources, authorizing and modifying programs, and evaluating program performance.

c. To provide consistency between costs reported in general purpose financial reports and costs reported to program managers. This includes standardizing terminology to improve communication among federal organizations and users of cost information.

.03 The first two objectives primarily address the managerial use of cost information in improving operating efficiency and cost-effectiveness, making planning and budgeting decisions, and measuring performance. The third objective primarily addresses external financial reporting, which can be achieved by reporting cost information in financial statements that is consistent with costs generated by the

cost accounting process. Because of the differences in the three objectives, some requirements in SFFAS 4 are relevant to managerial decision making and operations improvement, while some requirements are relevant to external financial reporting.

.04 The cost accounting concepts section of SFFAS 4 (paras. 41-66) establishes the overall goals of cost accounting for federal agencies. Managerial cost accounting should be a fundamental part of the financial management system and, to the extent practicable, be integrated with the other parts of the system. Managerial costing should use a basis of accounting, recognition, and measurement that is appropriate for the intended purpose. Cost information developed for various purposes should be drawn from a common data source, and output reports should be reconcilable to each other.

.05 The five fundamental standards for managerial cost accounting set forth in SFFAS 4 (paras. 67-162) are important for the auditor. These standards will lead to the development of accurate and consistent cost information for internal and external reporting by federal agencies. The five standards are as follows:

a. Requirement for cost accounting: Each reporting entity is to accumulate and regularly report the cost of its activities for management information.

b. Responsibility segments: Management of each reporting entity is to define and establish responsibility segments and report the costs of each segment's outputs.[18]

c. Full costs: Reporting entities are to report the full costs of outputs, which is the total amount of resources used to produce an output, including direct and indirect costs.

- Nonproduction costs: Per SFFAS 4, paragraph 104, nonproduction costs are costs linked to events other than the production of goods and services. Examples include other post-employment benefits,[19] reorganization, and certain nonrecurring cleanup costs. SFFAS 4, paragraph 104, states that assigning nonproduction costs to goods or services produced would distort production costs. Also, OMB Circular A-136 requires that material nonproduction costs be disclosed in a note to the financial statements or separately reported on the statement of net cost.

d. Inter-entity costs: Each entity's costs are to incorporate the full cost of goods and services received from other entities. SFFAS 55 allows flexibility for reporting imputed costs for non-business activities. Specifically, with the exception of imputed inter-entity costs for personnel benefits and the Treasury Judgment Fund settlements or as otherwise directed by the Office of Management and Budget, imputed inter-entity costs for non-business type activities are not required to be recognized. Although not required to do so,

[18]OMB Circular No. A-136, *Financial Reporting Requirements*, indicates that entities should report costs by major program. Most view the terms "responsibility segment" and "major programs" as interchangeable.

[19]Other post-employment benefits are provided to former or inactive employees, their beneficiaries, and covered dependents outside pension or other retirement benefit plans. These benefits include special termination benefits (such as specially authorized separation incentive programs), salary continuation, severance benefits, and continuation of health care or other benefits.

an entity may still elect to recognize imputed cost and corresponding imputed financing for other types of inter-entity costs related to non-business type activities.

e. Costing methodology: The costs of resources that directly or indirectly contribute to the production of outputs are to be accumulated and assigned to outputs using appropriate methodologies (see FAM 903.07).

Audit Procedures

.06 As part of understanding the entity's operations, the auditor generally should obtain an overview of how the entity applies FASAB cost standards. This may be done by inquiry, observation, and walk-through procedures. The auditor generally should determine what substantive testing procedures are appropriate and may coordinate testing with other control and substantive procedures. Based on the understanding of entity operations, the auditor should determine whether the statement of net cost is designed to include all costs of entity programs. Also, in testing the statement of net cost, the auditor generally should test the assertions related to costs, including whether expenses are properly classified in the statement of net cost. Based on FAM 395 B, examples of control objectives by assertion related to costs are provided below.

EXISTENCE OR OCCURRENCE

- **Occurrence/validity**—(1) Recorded costs, underlying goods and services received, and related processing procedures are authorized by federal laws, regulations, contracts, grant agreements, and management policy. (2) Appropriate individuals approve recorded costs in accordance with management's general or specific criteria. (3) Recorded costs represent goods and services actually received by the entity. (4) Costs are recorded in the proper accounts.
- **Cutoff**—Costs recorded in the current period represent goods and services received during the current period.
- **Summarization**—The summarization of recorded costs is not overstated.

COMPLETENESS

- **Transaction completeness**—All valid costs are recorded in the proper accounts.
- **Cutoff**—All goods and services received in the current period are recorded in the current period.
- **Summarization**—The summarization of recorded costs is not understated.

ACCURACY

- **Accuracy**—Amounts and other data relating to recorded costs have been appropriately recorded.

PRESENTATION AND DISCLOSURE

- **Presentation**—Cost information in the financial statements is appropriately aggregated or disaggregated and is clearly described.

  - If applicable, nonproduction costs are disclosed or reported separately from production costs.[20]

- **Consistency**—Costs in the financial statements are based on accounting principles that are applied consistently from period to period.
- **Disclosure**—Note disclosures related to costs are appropriately measured and described and are relevant and understandable in the context of U.S. GAAP. All note disclosures related to costs that should have been included in the financial statements have been included. Disclosed costs represent goods and services actually received by the entity.

.07 SFFAS 4 discusses three methods of assigning costs: directly tracing costs, assigning costs on a cause-and-effect basis, and allocating costs on a reasonable and consistent basis. Although the standard discusses these three methods in relation to assigning costs to responsibility segments and outputs, the methods are also applicable to assigning costs to financial statement line items in the statement of net cost, generally by program, and in the notes by budget functional classification. The different methods of assigning costs may require different auditing procedures for determining whether costs are properly classified in the statement of net cost by program.

.08 For directly traced costs (such as materials used in production or employees who worked on an output), the auditor generally should test whether costs were assigned to the appropriate program and/or budget functional classification.

.09 In some cases, costs may be assigned on a cause-and-effect basis, by grouping costs into cost pools where an intermediate activity may be a link between the cause and the effect. For example, an IT department may provide support to other departments. The IT department may assign costs to other departments on a cause-and-effect basis by first assigning costs to an intermediate activity, such as hardware installation or software design. The costs in these pools may then be further assigned to other departments based on their use of these technical services.

In auditing these types of costs, the auditor generally should test whether costs are assigned to the appropriate cost pool (e.g., hardware installation or software design) and also whether costs are appropriately summarized in the pool. When costs are assigned to other departments, the auditor generally should test whether costs assigned are based on appropriate usage information, cost assignments are reasonable and consistent, and they are mathematically accurate.

.10 If it is not economically feasible to either directly trace or assign costs on a cause-and-effect basis, the entity may allocate costs. This is commonly done with costs such as general management, depreciation, rent, maintenance, security, and utilities that various segments use. These costs are generally accumulated in cost pools and allocated to segments or outputs (or programs or budget functional classifications) using a cost driver, such as number of employees, square footage of office space, or amount of direct costs incurred in

[20]Reporting entities may report nonproduction costs separately from production costs within a reported responsibility segment (or major program) or may report nonproduction costs separately from the reporting segments (or major programs) as costs not assigned to programs.

segments.

In auditing these allocated costs, the auditor generally should test whether the costs are assigned to the appropriate cost pool and summarized appropriately. The auditor also generally should determine whether the allocation basis is reasonable and consistent, the mathematical allocation is correct, and an allocation is appropriate in the circumstances.

.11 Given the requirement to disclose nonproduction costs or separately report nonproduction costs from production costs, auditors need to be aware of the definition of nonproduction costs and the corresponding reporting requirements. Auditors should include procedures to identify potential material nonproduction costs and, if such costs exist, perform sufficient audit procedures to assure that such costs are properly disclosed or reported.

.12 The entity exercises professional judgment in determining the line item and programs to include in its statement of net cost. The auditor generally should consider whether such classifications are reasonable in the circumstances and to ensure that cost assignment methods and procedures are reasonable and documented.

Federal Financial Management Improvement Act of 1996 (FFMIA)

.13 For audits of the CFO Act agencies, the auditor must evaluate whether agency financial management systems comply substantially with the three requirements of FFMIA (see FAM 701). To determine compliance with SFFAS 4 and SFFAS 55 for the purposes of FFMIA, the auditor generally should ask the following questions (which relate to the standards discussed in FAM 903.05):

a. Has the agency defined its responsibility segments to delineate costs?

b. Does the agency properly accumulate full costs by those responsibility segments?

c. Has the agency accounted for the full costs (including inter-entity costs) of products, services, or outputs to be externally reported at the entity-wide level?

d. Has the agency accounted for the full cost of resources that contribute to the production of outputs by individual responsibility segment using appropriate costing methodologies (see FAM 903.07)?

e. Has the agency reported full costs in the year-end financial statements on the accrual basis of accounting?

f. Are costs reported for external financial reporting and those reported for internal management reporting consistent and reconcilable?

g. How does management determine compliance with FFMIA?

The auditor generally should combine this inquiry with the procedures in FAM 903.06 and consider the outcome in concluding about compliance with the cost accounting requirements under FFMIA. Also, the auditor generally should review evidence supporting management’s assertions in response to these questions, as further discussed in FAM 701.

904 – Disclosure Entities, Related Parties, and Public-Private Partnerships

.01 Under FASAB standards, organizations are considered to be related parties if the existing relationship or one party to the existing relationship has the ability to exercise significant influence over the other party's policy decisions. In the federal government, there are additional relationships that present risks similar to related parties, as defined by FASAB. These include disclosure entities and public-private partnerships. Consequently, while AU-C 550, *Related Parties*, addresses only related parties, the auditor should extend the audit procedures in AU-C 550 to disclosure entities; public-private partnerships; and other relationships, transactions, and balances that present similar risks. The requirements for relationships and transactions with disclosure entities, related parties, and public-private partnerships are discussed in this section and in FAM 220, 265, 280, 340, and 550. Note that FASAB and the Financial Accounting Standards Board (FASB) provide different definitions for related parties. Procedures pertaining to disclosure entities and public-private partnerships do not apply to entities issuing financial statements in accordance with FASB accounting standards.

In addition, there may be similar risks of material misstatement related to intragovernmental transactions and balances. Generally, the FAM addresses intragovernmental transactions and balances separately given their significance and prevalence. For example, see FAM 230, 902, 921, and 1001.

.02 As discussed in FAM 420, the auditor is to design and perform audit procedures whose nature, timing, and extent respond to the risks of material misstatement, including risks arising from the entity's failure to appropriately account for or disclose relationships, transactions, or balances with disclosure entities, related parties, and public-private partnerships.

.03 With respect to disclosure entities, related parties, and public-private partnerships, the objectives of the auditor are to do the following (AU-C 550.09):

a. Obtain an understanding of the relationships and transactions sufficient to be able to

   - recognize fraud risk factors, if any, arising from those relationships and transactions that are relevant to the identification and assessment of the risks of material misstatement due to fraud and
   - conclude, based on the audit evidence obtained, whether the financial statements, insofar as they are affected by those relationships and transactions, achieve fair presentation.

b. Obtain sufficient appropriate audit evidence about whether the relationships and transactions have been appropriately identified, accounted for, and disclosed in the financial statements.

Further, the nature of relationships and transactions with disclosure entities, related parties, and public-private partnerships may, in some circumstances, give rise to higher risks of material misstatement of the financial statements than transactions with unrelated parties (AU-C 550.03). For example,

- disclosure entities, related parties, and public-private partnerships may operate through an extensive and complex range of relationships and structures, with a corresponding increase in the complexity of the transactions involved;
- information systems may be ineffective at identifying or summarizing transactions and outstanding balances between an entity and its disclosure entities, related parties, and public-private partnerships;
- transactions with disclosure entities, related parties, and public-private partnerships may not be conducted under normal market terms and conditions (for example, some transactions may be conducted with no exchange of consideration); and
- transactions with disclosure entities, related parties, and public-private partnerships may be motivated solely or in large measure to engage in fraudulent financial reporting or conceal misappropriation of assets.

.04 The auditor should inspect the following for indications of the existence of relationships or transactions with disclosure entities, related parties, and public-private partnerships that management has not previously identified or disclosed to the auditor (AU-C 550.17):

a. bank and legal confirmations obtained as part of the auditor's procedures,

b. minutes of meetings of those charged with governance and summaries of actions of recent meetings for which minutes have not yet been prepared, and

c. other records or documents considered necessary in the circumstances.

.05 If the auditor identifies significant unusual transactions (i.e., those outside the entity's normal course of business), the auditor should inquire of management about the following (AU-C 550.18):

a. the nature of these transactions and

b. whether disclosure entities, related parties, or public-private partnerships could be involved.

Further, if the auditor identifies fraud risk factors (including circumstances relating to the existence of a disclosure entity, related party, or public-private partnership with dominant influence) when performing the risk assessment procedures in FAM 265 and related activities in connection with such entities, the auditor should consider such information when identifying and assessing the risks of material misstatement due to fraud (AU-C 550.21).

.06 The auditor should design and perform further audit procedures to obtain sufficient appropriate audit evidence about the risks of material misstatement associated with relationships and transactions with disclosure entities, related parties, and public-private partnerships. The auditor should evaluate whether the entity has properly identified these relationships and transactions. Evaluating whether an entity has properly identified these relationships and transactions involves more than assessing the entity's process. The evaluation should include procedures to test the accuracy and completeness of the relationships and transactions that the entity identified, taking into account the information gathered during the audit. (AU-C 550.22)

.07 The auditor should perform procedures on balances with disclosure entities, related parties, and public-private partnerships as of concurrent dates, even if fiscal years of the respective entities differ. The procedures performed should address the risks of material misstatement associated with the entity's accounts with these entities. (AU-C 550.23)

.08 If the auditor identifies arrangements or information that suggests the existence of relationships or transactions with disclosure entities, related parties, or public-private partnerships that management has not previously identified or disclosed to the auditor, the auditor should determine whether the underlying circumstances confirm the existence of those relationships or transactions (AU-C 550.24).

.09 If the auditor identifies disclosure entities, related parties, or public-private partnerships or significant transactions with them that management has not previously identified or disclosed to the auditor, the auditor should perform the following (AU-C 550.25):

a. Promptly communicate the relevant information to the other members of the engagement team.

b. Request that management identify all transactions with the newly identified disclosure entities, related parties, and public-private partnerships for the auditor's further evaluation.

c. Inquire why the entity's controls over relationships and transactions with disclosure entities, related parties, and public-private partnerships failed to identify or disclose those relationships or transactions.

d. Perform appropriate substantive audit procedures relating to such newly identified disclosure entities, related parties, and public-private partnerships or significant transactions with them.

e. Reconsider the risk that other disclosure entities, related parties, and public-private partnerships or significant transactions with them may exist that management has not previously identified or disclosed to the auditor and perform additional audit procedures as necessary.

f. Evaluate the implications for the audit if management's nondisclosure appears intentional (and therefore indicative of a risk of material misstatement due to fraud).

.10 For identified significant transactions with disclosure entities, related parties, and public-private partnerships that are required to be disclosed in the financial statements or determined to be a significant risk, the auditor should perform the following (AU-C 550.26):

a. Read the underlying contracts or agreements, if any, and evaluate whether

- the business purpose (or lack thereof) of the transactions suggests that they may have been entered into to engage in fraudulent financial reporting or to conceal misappropriation of assets,
- the terms of the transactions are consistent with management's explanations, and
- the transactions have been appropriately accounted for and disclosed.

b. Obtain audit evidence that the transactions have been appropriately authorized and approved.

If management has made an assertion in the financial statements to the effect that a transaction with a disclosure entity, related party, or public-private partnership was conducted on terms equivalent to those prevailing in an arm's length transaction, the auditor should obtain sufficient appropriate audit evidence about the assertion (AU-C 550.27).

905 – Auditing Accounting Estimates

Overview

.01 This section provides guidance for auditing accounting estimates and related note disclosures. Accounting estimates vary widely in nature and are required to be made by management when the monetary amounts cannot be directly observed. The measurement of these monetary amounts is subject to estimation uncertainty, which reflects inherent limitations in knowledge or data. These limitations give rise to inherent subjectivity and variation in the measurement outcomes. The process of making accounting estimates involves selecting and applying a method using assumptions and data, which requires judgment by management and can give rise to complexity in measurement. (AU-C 540.02)

.02 The following terms are used throughout this section to describe management's process for making accounting estimates:

a. A **method** is a measurement technique used by management to make an accounting estimate in accordance with the required measurement basis. A method is applied using a computational tool or process, sometimes referred to as a **model**, and involves applying assumptions and data and taking into account a set of relationships between them (AU-C 540.A2). Examples of models include

- an expected credit loss model that uses a complex set of historical data and assumptions about future developments in a variety of entity-specific scenarios that may be difficult to predict (AU-C 540.A67) and
- a valuation model that calculates the present value of expected future cash flows (AU-C 540.A39).

b. **Assumptions** involve judgment based on available information, such as the choice of an interest rate or a discount rate, or judgments about future conditions or events. An assumption may be selected by management from a range of appropriate alternatives (AU-C 540.A3). Assumptions that are made or identified by management's specialists become management's assumptions when used by management in making an accounting estimate (AU-C 540.A130).

c. **Data** refers to information that can be obtained through direct observation or from an external party (AU-C 540.A4). Data can be generated within the entity or externally, obtained from a system that is either within or outside the general or subsidiary ledgers, observable in contracts, or observable in legislative or regulatory pronouncements (AU-C 540.A6). Examples of data include prices generated by market transactions and historical prices or other terms included in contracts, such as a contracted interest rate or payment schedule (AU-C 540.A5).

.03 Although this section applies to all accounting estimates, the degree to which an accounting estimate is subject to estimation uncertainty will vary substantially. The nature, timing, and extent of the risk assessment and further audit procedures will vary in relation to the estimation uncertainty and the assessment of the related risks of material misstatement. For certain accounting estimates, estimation uncertainty may be very low, based on their nature, and the

complexity and subjectivity involved in making them may also be very low. For such accounting estimates, the risk assessment procedures and further audit procedures would not be expected to be extensive. When estimation uncertainty, complexity, or subjectivity are very high, such procedures would be expected to be much more extensive. (AU-C 540.03)

.04 Examples of accounting estimates include fair value of assets or liabilities; allowance for loss on accounts receivable; depreciation of property and equipment; employee retirement benefits liabilities; outcome of pending litigation; and valuation of financial instruments and infrastructure assets, such as buildings and roadways. Depending on the nature of a particular accounting estimate, the susceptibility of an assertion to a misstatement that could be material may be subject to or affected by estimation uncertainty, complexity, subjectivity, or other inherent risk factors, and the interrelationship among them (AU-C 540.04). See AU-C 540.A152 for a detailed discussion on inherent risk factors related to accounting estimates.

.05 The exercise of professional skepticism in relation to accounting estimates is affected by the auditor's consideration of inherent risk factors, and its importance increases when accounting estimates are subject to a greater degree of estimation uncertainty or are affected to a greater degree by complexity, subjectivity, or other inherent risk factors. Similarly, the exercise of professional skepticism is important when there is greater susceptibility to misstatement due to management bias or other fraud risk factors insofar as they affect inherent risk. (AU-C 540.07)

Although there may be no single way in which the auditor's exercise of professional skepticism is documented, the audit documentation may nevertheless provide evidence of the auditor's exercise of professional skepticism. For example, in relation to accounting estimates, when the audit evidence obtained includes evidence that both corroborates and contradicts management's assertions, the documentation may include how the auditor evaluated that evidence, including professional judgments made in forming a conclusion about the sufficiency and appropriateness of the audit evidence obtained. (AU-C 540.A151)

Audit Procedures

.06 The objective of the auditor is to obtain sufficient appropriate audit evidence about whether accounting estimates in the financial statements and related note disclosures are reasonable in the context of the applicable financial reporting framework (generally U.S. GAAP) (AU-C 540.10). Reasonable, in this context, means that the relevant requirements of the framework have been applied appropriately, including those that address the following (AU-C 540.08):

a. the development of the accounting estimate, including the selection of the method, assumptions, and data in view of the nature of the accounting estimate and the facts and circumstances of the entity;

b. the selection of management's point estimate; and

c. the note disclosures about the accounting estimate, including those about how the accounting estimate was developed and that explain the nature, extent, and sources of estimation uncertainty.

.07 With respect to accounting estimates, the auditor should determine whether the engagement team requires specialized skills or knowledge to design and perform audit procedures to respond to risks of material misstatement or to evaluate the audit evidence obtained (AU-C 540.14). Certain accounting estimates may require review by accounting specialists (see FAM 620). When using the work of management's specialists, the guidance in FAM 905 may assist the auditor in evaluating the appropriateness of the specialist's work as audit evidence for a significant assertion (AU-C 540.30). See FAM 625 for guidance on using the work of managements' specialists.

.08 As discussed in FAM 420, the auditor performs risk assessment procedures in the planning and internal control phases of the audit and performs further audit procedures in the testing phase that are responsive to the risks of material misstatement at the assertion level, considering the reasons for the assessment given to those risks. The auditor's further audit procedures should include one or more of the following approaches (AU-C 540.17):

a. obtaining audit evidence from events occurring up to the date of the auditor's report (see FAM 905.09 and AU-C 540.A91–.A93),

b. testing how management made the accounting estimate (see FAM 905.10–.15 and AU-C 540.A94–.A117), or

c. developing an auditor's point estimate or range (see FAM 905.16–.17 and AU-C 540.A118–.A125).

The auditor's further audit procedures should take into account that the higher the risk of material misstatement, the more persuasive the audit evidence needs to be. The auditor should design and perform further audit procedures in a manner that is not biased toward obtaining audit evidence that may be corroborative or toward excluding audit evidence that may be contradictory (AU-C 540.17).

.09 When the auditor's further audit procedures include obtaining audit evidence from events occurring up to the date of the auditor's report, the auditor should evaluate whether such audit evidence is sufficient and appropriate to address the risks of material misstatement relating to the accounting estimate, taking into account that changes in circumstances and other relevant conditions between the event and the measurement date may affect the relevance of such audit evidence in the context of the applicable financial reporting framework (generally U.S. GAAP) (AU-C 540.20). For some accounting estimates, events occurring up to the date of the auditor's report are unlikely to provide sufficient appropriate audit evidence regarding the accounting estimate. For example, the conditions or events relating to some accounting estimates develop only over an extended period. Also, because of the measurement objective of fair value accounting estimates, information after the period-end may not reflect the events or conditions existing at the balance sheet date and, therefore, may not be relevant to the measurement of the fair value accounting estimate. (AU-C 540.A92)

.10 When testing how management made the accounting estimate, the auditor's further audit procedures should include procedures, designed and performed in accordance with FAM 905.11 through .14, to obtain sufficient appropriate audit evidence regarding the risks of material misstatement relating to the following (AU-C 540.21):

a. the selection and application of the methods, significant assumptions, and data used by management in making the accounting estimate and

b. how management selected the point estimate and developed related note disclosures about estimation uncertainty.

.11 In applying the requirements of FAM 905.10, with respect to methods, the auditor's further audit procedures should address the following (AU-C 540.22):

a. whether the method selected is appropriate in the context of the applicable financial reporting framework (generally U.S. GAAP) and, if applicable, changes from the method used in prior periods are appropriate;

b. whether judgments made in selecting the method give rise to indicators of possible management bias;

c. whether the calculations are applied in accordance with the method and are mathematically accurate;

d. when management's application of the method involves complex modeling, whether judgments have been applied consistently, and whether, when applicable,

- the design of the model meets the measurement objective of the applicable financial reporting framework (generally U.S. GAAP), is appropriate in the circumstances, and if applicable, changes from the prior period's model are appropriate in the circumstances and
- adjustments to the output of the model are consistent with the measurement objective of the applicable financial reporting framework (generally U.S. GAAP) and are appropriate in the circumstances; and

e. whether the integrity of the significant assumptions and the data has been maintained in applying the method.

.12 In applying the requirements of FAM 905.10, with respect to significant assumptions, the auditor's further audit procedures should address the following (AU-C 540.23):

a. whether the significant assumptions are appropriate in the context of the applicable financial reporting framework (generally U.S. GAAP) and, if applicable, changes from prior periods are appropriate;

b. whether judgments made in selecting the significant assumptions give rise to indicators of possible management bias;

c. whether the significant assumptions are consistent with each other and with those used in other accounting estimates, or with related assumptions used in other areas of the entity's activities, based on the auditor's knowledge obtained in the audit; and

d. when applicable, whether management has the intent to carry out specific courses of action and has the ability to do so.

.13 In applying the requirements of FAM 905.10, with respect to data, the auditor's further audit procedures should address the following (AU-C 540.24):

a. whether the data are appropriate in the context of the applicable financial reporting framework (generally U.S. GAAP), and if applicable, changes from prior periods are appropriate;

b. whether judgments made in selecting the data give rise to indicators of possible management bias;

c. whether the data are relevant and reliable in the circumstances; and

d. whether the data have been appropriately understood or interpreted by management, including with respect to contractual terms.

.14 In applying the requirements of FAM 905.10, the auditor's further audit procedures should address whether, in the context of the applicable financial reporting framework (generally U.S. GAAP), management has taken appropriate steps to

a. understand estimation uncertainty and

b. address estimation uncertainty by selecting an appropriate point estimate and by developing related note disclosures about estimation uncertainty (AU-C 540.25).

Relevant considerations regarding whether management has taken appropriate steps to understand and address estimation uncertainty may include whether management has

- understood the estimation uncertainty by identifying the sources and assessing the degree of inherent variability in the measurement outcomes and the resulting range of reasonably possible measurement outcomes (AU-C 540.A109a);
- identified the degree to which, in the measurement process, complexity or subjectivity affect the risk of material misstatement, and addressed the resulting potential for misstatement by applying
  - appropriate skills and knowledge in making accounting estimates and
  - professional judgment, including identifying and addressing susceptibility to management bias (AU-C 540.A109b); and
- developed note disclosures about estimation uncertainty that appropriately describe the amount as an estimate and explain the nature and limitations of the estimation process, including the variability of the reasonably possible measurement outcomes (AU-C 540.A110).

.15 When, in the auditor's judgment based on the audit evidence obtained, management has not taken appropriate steps to understand or address estimation uncertainty, the auditor should (AU-C 540.26):

a. request that management perform additional procedures to understand estimation uncertainty, or address it by reconsidering the selection of management's point estimate or considering providing additional note disclosures relating to the estimation uncertainty, and evaluate management's responses;

b. to the extent practicable, develop an auditor's point estimate or range, in accordance with FAM 905.16 and .17, if the auditor determines that management's response to the auditor's request does not sufficiently address estimation uncertainty; and

c. evaluate whether a deficiency in internal control exists and, if so, communicate the matter in accordance with the Communicate with Those

Charged with Governance subsection in FAM 550 and Internal Control subsection in FAM 580.

.16 When the auditor develops a point estimate or range to evaluate management's point estimate and related note disclosures about estimation uncertainty, including when determined necessary in FAM 905.15b, the auditor's further audit procedures should include procedures to evaluate whether the methods, assumptions, or data used are appropriate in the context of the applicable financial reporting framework (generally U.S. GAAP). Regardless of whether the auditor uses management's or the auditor's own methods, assumptions, or data, these further audit procedures should be designed and performed to address the matters in FAM 905.11 through .13 (AU-C 540.27). The auditor may also develop a point estimate or range for only part of the accounting estimate (e.g., for a particular assumption or when only a certain part of the accounting estimate is giving rise to the risk of material misstatement) (AU-C 540.A122).

.17 If the auditor develops an auditor's range, the auditor should

a. determine that the range includes only amounts that are supported by sufficient appropriate audit evidence and have been evaluated by the auditor to be reasonable in the context of the measurement objectives and other requirements of the applicable financial reporting framework (generally U.S. GAAP) and

b. design and perform further audit procedures to obtain sufficient appropriate audit evidence regarding the risks of material misstatement relating to the note disclosures in the financial statements that describe the estimation uncertainty (AU-C 540.28).

With respect to item a, the auditor is not expected to obtain audit evidence to support each possible outcome in the range individually. Rather, the auditor is likely to obtain evidence to determine that the points at both ends of the range are reasonable in the circumstances, thereby supporting that amounts falling between those two points also are reasonable (AU-C 540.A124).

The auditor may conclude that a range that is multiples of materiality is, in the auditor's judgment, appropriate in the circumstances. When this is the case, the auditor's evaluation of the reasonableness of the note disclosures about estimation uncertainty becomes increasingly important, particularly whether such note disclosures appropriately convey the high degree of estimation uncertainty and the range of possible outcomes. (AU-C 540.A125)

.18 The auditor should evaluate whether judgments and decisions made by management in making accounting estimates included in the financial statements, even if they are individually reasonable, are indicators of possible management bias. When indicators of possible management bias are identified, the auditor should evaluate the implications for the audit. When there is intention to mislead, management bias is fraudulent in nature. (AU-C 540.32)

Examples of indicators of possible management bias with respect to accounting estimates include

- changes in an accounting estimate, or method for making it, when management has made a subjective assessment that there has been a change in circumstances;

- selection or development of significant assumptions or the data that yield a point estimate favorable for management objectives; and
- selection of a point estimate that may indicate a pattern of optimism or pessimism (AU-C 540.A134).

When such indicators are identified, there may be a risk of material misstatement either at the assertion or financial statement level. Indicators of possible management bias themselves do not constitute misstatements for the purposes of drawing conclusions about the reasonableness of individual accounting estimates (see FAM 540.03). However, in some cases, the audit evidence may point to a misstatement rather than simply an indicator of management bias. (AU-C 540.A134)

.19 As discussed in FAM 350, for those control activities that have been suitably designed and implemented, the auditor should perform sufficient tests of such control activities to conclude whether the control activities are operating effectively (i.e., sufficient tests of control activities to support a low level of assessed control risk). In relation to accounting estimates, the auditor's tests of such controls should be responsive to the reasons for the assessment given to the risks of material misstatement. In designing and performing tests of controls, the auditor should obtain more persuasive audit evidence the greater the reliance the auditor places on the effectiveness of a control. (AU-C 540.18) See AU-C 540.A86 through .A89 for auditor considerations when testing controls related to accounting estimates. Based on AU-C 540.19, when the approach to a significant risk relating to an accounting estimate consists only of substantive procedures (i.e., controls are not suitably designed and implemented), the auditor's procedures should include tests of details.

.20 Based on the results of risk assessment procedures performed in the planning and internal control phases, the auditor should design and perform further audit procedures to obtain sufficient appropriate audit evidence regarding the risks of material misstatement at the assertion level for note disclosures related to an accounting estimate, including those procedures related to estimation uncertainty as discussed in FAM 905.14b and .17b (AU-C 540.31).

.21 The auditor should evaluate, based on the audit procedures performed and audit evidence obtained, whether (AU-C 540.33):

a. the assessments of the risks of material misstatement at the assertion level remain appropriate, including when indicators of possible management bias have been identified;

b. management's decisions relating to the recognition, measurement, presentation, and disclosure of these accounting estimates in the financial statements are in accordance with the applicable financial reporting framework (generally U.S. GAAP); and

c. sufficient appropriate audit evidence has been obtained.

In making this evaluation, the auditor should take into account all relevant audit evidence obtained, whether corroborative or contradictory. If the auditor is unable to obtain sufficient appropriate audit evidence, the auditor should evaluate the implications for the audit or the auditor's opinion on the financial statements in accordance with FAM 580.43 (AU-C 540.34). With respect to accounting estimates that have not been recognized, a particular focus of the auditor's

evaluation may be whether the recognition criteria of the applicable financial reporting framework (generally U.S. GAAP) have, in fact, been met (AU-C 540.A138).

.22 The auditor should determine whether the accounting estimates and related note disclosures are either reasonable in the context of the financial reporting framework (generally U.S. GAAP) or are misstated (AU-C 540.35). The greater the degree to which an accounting estimate is subject to estimation uncertainty, the more likely the risks of material misstatement will be assessed as higher and, therefore, the more persuasive the audit evidence needs to be to determine whether management's point estimate and related disclosures about estimation uncertainty are reasonable in the context of the applicable financial reporting framework (generally U.S. GAAP), or are misstated (AU-C 540.A113).

.23 In relation to the accounting estimates, the auditor should also evaluate whether management has included note disclosures beyond those specifically required by the framework that are necessary to achieve the fair presentation of the financial statements as a whole (AU-C 540.36).

Additionally, the auditor should evaluate whether accounting estimates, while individually reasonable, consistently overstate or understate components of the financial statements, such as total assets or total expenditures, and indicate that possible management bias exists in the accounting estimates. If so, the auditor should evaluate the effects on the financial statements in addition to any uncorrected misstatements when determining the appropriate type of opinion. See FAM 540 for further guidance on uncorrected misstatements.

.24 For documentation requirements related to accounting estimates, see FAM 290.04 (entity profile), 390.06 (cycle memorandums), and 490.06f (testing phase documentation).

921 – Auditing Fund Balance with Treasury

Overview

.01 This section provides guidance on auditing fund balance with Treasury (FBWT) accounts. A federal entity's FBWT account (USSGL account 1010) is an intragovernmental asset account, unique to the U.S. government, representing the aggregate amount of funds with Treasury for which the entity is authorized to make expenditures and pay liabilities. From the entity's perspective, FBWT is an asset because it represents the entity's claim to the federal government's resources.

.02 Entities record their budget authority in FBWT accounts with an offsetting amount to unexpended appropriations (USSGL account series 3100). FBWT increases as funding is obtained (for example, through appropriations, nonexpenditure transfers, amounts borrowed, or offsetting collections[21]) and decreases as amounts are disbursed (for example, through cash or intragovernmental payments).[22] Most entities have multiple FBWT accounts funded by different appropriations that are included in the financial statement FBWT line item.[23] These accounts are identified by specific Treasury account symbols (TAS). Treasury maintains the *Federal Accounting Symbols and Titles (FAST) Book*, which lists receipt, appropriation, and other fund account symbols and titles that Treasury assigns.

.03 This section also provides guidance to the auditor when auditing TASs and business event type codes (BETC) associated with FBWT transactions. Determining the accuracy of TASs and BETCs assigned to FBWT transactions is essential to determining whether the entities' financial statements are consistent with the U.S. government's consolidated financial statements.

a. A TAS is used to represent the federal entity's individual receipt, appropriation, outlay, and other fund account symbols as assigned by Treasury. It is composed of various components (e.g., agency identifier code, beginning period of availability, ending period of availability, and main account). For a list of all components and the definition of each component, see https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars/faqs (accessed May 29, 2026).

[21]Offsetting collections are those authorized by law to be credited to appropriation or expenditure accounts. Governmental receipts, such as income tax collections, are generally not available for expenditure by federal entities; spending authority must be granted through appropriations acts or other statutes. All receipts that are not earmarked by law for specific purposes are recorded in receipt accounts of the General Fund of the U.S. Government (General Fund). The General Fund is a component of Treasury's central accounting function. It is a stand-alone reporting entity that comprises the activities fundamental to funding the federal government (e.g., issued budget authority cash activity and debt financing activities). Entities record General Fund receipts as FBWT and a custodial liability with the General Fund throughout the fiscal year. At fiscal year-end, entities transfer these receipts to the General Fund, which decreases FBWT.

[22]An entity's FBWT is reduced by (1) disbursements made to pay liabilities or to purchase assets, goods, and services; (2) investments in U.S. securities (securities issued by Treasury or other federal government entities); (3) cancellation of expired appropriations; (4) transfers and reimbursements to other entities or to the General Fund; and (5) sequestration or rescission of appropriations.

[23]Appropriations may be annual, multiyear, or no year.

b. A BETC is a code that indicates the type of activity being reported, such as payments, collections, and investments, and the effect that activity has against the TAS balance. Fiscal Service periodically develops new BETCs and provides guidance on its website to help entities properly assign BETCs to FBWT transactions.[24]

.04 Entities may also maintain specific types of FBWT accounts, such as those for collections pending litigation; amounts awaiting determination of the proper accounting disposition; or moneys that the entity is holding in the capacity of a banker or agent for others, such as nonentity, trust, or escrow accounts. Certain funds from dedicated collections may also be designated for specific purposes or restricted use.

.05 Entities may have FBWT balances in clearing accounts due to unidentified and unclassified transactions. Clearing accounts include both suspense and default accounts and are identified by specific TASs. Clearing accounts are used to temporarily record transactions prior to recording them in the proper FBWT account. A clearing account is used because the proper FBWT account could not be determined at the time the transaction was recorded. When the proper account is determined, the *Treasury Financial Manual* (TFM) requires that the entity move the amount from the clearing account to the proper account within 60 business days. The TFM also requires CFOs or their designees to certify suspense account balances to Fiscal Service annually, at year-end. Also, Fiscal Service measures entities' usage of default and suspense accounts and scores entities accordingly.[25]

TAS and BETC

.06 Determining the accuracy of TASs and BETCs assigned to FBWT transactions is essential to determining whether the entities' financial statements are consistent with the U.S. government's consolidated financial statements, including the Statements of Changes in Cash Balance from Budget and Other Activities (Cash Statement) and the budget receipts and outlays included therein.[26]

.07 Entities are responsible for assigning the appropriate TAS and BETC to each FBWT transaction reported in the Central Accounting Reporting System (CARS). Fiscal Service uses TASs and BETCs to produce the Cash Statement. The primary purpose of the Cash Statement is to report how the annual budget surplus or deficit relates to the change in the U.S. government's cash balance and federal debt. Fiscal Service uses automated logic (a set of mapping rules) to assign each transaction in CARS to a line item on the Cash Statement based on its TAS and BETC.

[24]Fiscal Service provides a listing of BETCs on its website. See https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars/faqs (accessed May 29, 2026).

[25]See *Treasury Financial Manual*, vol. 1, pt. 2, ch. 5100, *Section 5135—Budget Clearing Accounts*.

[26]Statement of Federal Financial Accounting Standards (SFFAS) 24, *Selected Standards for the Consolidated Financial Report of the United States Government*, requires that the Cash Statement be presented in the U.S. government's consolidated financial statements.

.08 Since entities assign the TAS and BETC data elements to most transactions, entities are responsible for classifying these transactions appropriately.[27] As such, entities maintain all the detailed information supporting assignment of these data elements and are responsible for the related internal controls.

.09 Entities classify collections transactions with a TAS and BETC through CARS's Shared Accounting Module (SAM).[28] Collection reporting systems (e.g., Pay.gov and OTCnet) process collections received and automatically code each with a TAS and BETC or a Classification Key (C-Key) based on the Cash Flow Profiles (CFP) that the entity set up in SAM).[29] For transactions that cannot be automatically coded with the correct TASs and BETCs, entities use clearing TASs and BETCs or set up default rules in CFPs to temporarily record the transactions and subsequently research and reclassify these transactions to the appropriate TASs and BETCs.

.10 C-Keys are necessary if the collection reporting system does not permit the selection of the TAS and BETC. Fiscal Service requires entities to map the C-Key value to the TAS and BETC combination in their CFPs and uploading the CFPs in SAM. Entities are also responsible for mapping the C-Key in the collection reporting system. If a C-Key sent from the collection reporting system did not match a C-Key set up in the entity's CFP, then a default TAS and BETC will be assigned automatically, and the entity will need to reclassify the default TAS and BETC subsequently. Entities are responsible for maintaining the consistency between the C-Keys set up in the collection reporting systems and the C-Keys set up in the CFPs.

.11 Entities with disbursements (payments) processed through Treasury Disbursing Offices are responsible for submitting accurate payment schedules to Fiscal Service, including classifying each payment with the appropriate TAS and BETC. Entities submit payment requests via the Secure Payment System (SPS) and must include a TAS and BETC for each payment. An entity's invoice processing system may automatically assign TASs and BETCs to the payment schedule based on invoice attributes such as fund code, line of accounting, organization code, program code, or object class code. After a payment is processed, if SAM determines that the assigned TAS and BETC are invalid, it assigns the affected payment a default TAS and BETC selected by the entity.

.12 Entities use G-Invoicing to initiate interagency buy/sell transactions, which are subsequently processed through the IPAC system. G-Invoicing requires entities to assign an appropriate TAS and BETC when initiating the transaction.

.13 Entities report two types of transactions related to TASs and BETCs through the reclassification process via the CARS Classification Transactions and Accountability (CTA) module:

[27]Fiscal Service assigns TASs and BETCs to certain transactions, such as appropriation warrants, that it initiates on behalf of entities.

[28]See the Accounting and Reporting Information: G-Invoicing and Intragovernmental Payment and Collection System (IPAC) subsection in FAM 902.

[29]A C-Key is a unique agency account code that maps to valid TAS and BETC classification for collections processed through that account in Fiscal Service's SAM.

- The first type of transaction is the submission of noncash transactions, such as accruals and amortization. Entities typically record accruals and amortization in their financial management systems and subsequently submit reclassification entries via the CTA module for CARS reporting. TAS and BETC information must be included in such an entry.

Central Accounting Reporting System

.14 Fiscal Service is the entity responsible for accounting for the cash activity of the U.S. government, which is affected by FBWT activity reported by entities. Fiscal Service maintains CARS for government-wide accounting and reporting purposes.[30] CARS enables entities to classify and transmit FBWT transactions with TASs and BETCs on a transactional level upon initiation (i.e., full-CARS reporting).[31] CARS provides the following functions relevant to the FBWT reporting process:

- Captures appropriation,[32] collection and disbursement (including intragovernmental), and other FBWT activity by TAS, BETC, and Agency Location Code.[33]
- Allows entities access to transaction information reported through Fiscal Service collection reporting systems, payment information systems, and other sources to support research and reconciliation of Fiscal Service and entity FBWT records. Allows entities to process nonexpenditure transfers in the CARS Agency Transaction Module.
- Allows entities to report some information, such as adjustments or other supplementary information, directly to CARS using the CARS CTA module.
- Provides Statements of Differences for differences between (1) information reported by entities into CARS via the CTA module and (2) information reported to CARS by Fiscal Service collection reporting systems and payment information systems.
- Provides entities with FBWT Account Statements. Treasury provides these statements by TAS and Agency Location Code, and the statements include a roll forward of the previous month's balance; the current month's activity; and other account activity, such as supplemental appropriations, rescissions, nonexpenditure transfers, and activity reported by other entities. Entities can use these reports to reconcile FBWT.

[30]CARS provides accounting for each appropriation, fund, and receipt account's FBWT, as well as accounting for government cash and monetary assets.

[31]Not all entities have implemented such capability and instead report summarized transactions each month to Treasury's CARS (i.e., non-CARS reporting). Treasury hopes to transition the remaining entities to full-CARS reporting in the coming years. Therefore, the guidance in FAM 921 focuses on processes associated with full-CARS reporting.

[32]Fiscal Service records appropriation authority in CARS using annual appropriations acts and other relevant statutes.

[33]The Agency Location Code is a unique four-digit or eight-digit numerical identifier assigned to entity accounting offices for reporting collection and disbursement activity. Entities that use Treasury Disbursing Offices have an eight-digit identifier, while entities that have their own disbursing authority have a four-digit identifier. Entities must have valid Agency Location Codes to process transactions for authorized TASs.

Reconciliations

.15 An entity's regular reconciliation of its internal FBWT records with FBWT activity reported to CARS via other sources (e.g., collection reporting systems and payment information systems) is a control activity in maintaining the accuracy and reliability of entity FBWT records. Effective reconciliations serve as a detection control for identifying unauthorized and unrecorded transactions at the entities and at Treasury. Reconciliations are also important in providing an accurate measurement of the status of available resources, which is helpful in preventing entity disbursements from exceeding appropriated amounts. Treasury provides the following examples of reconciliations that entities can perform.[34]

a. **FBWT reconciliation by TAS:** Entails matching the balance on Treasury's CARS account statement by TAS with the corresponding balance in the entity's accounting records.

b. **Cash activity reconciliation by Agency Location Code and by source/sending trading partner:** Entails matching transaction amounts reported in Treasury's CARS Agency Location Code account statement with those recorded in the entity's accounting records.

c. **TAS and BETC reconciliation:** Entails incorporating a reconciliation at the TAS and BETC level as part of the cash activity reconciliation by Agency Location Code and by source/sending trading partner.

.16 Most entities process their collections through collection reporting systems and disbursements (payments) through Treasury Disbursing Offices. Other entities, which have authority to collect or disburse funds on their own behalf, may reconcile collection and disbursement activity recorded in their general ledger directly with collections and disbursements reports from the Federal Reserve Bank systems.[35]

Additional Resources for Accounting and Reporting Information

.17 To obtain a further understanding of entity's accounting and reporting for FBWT, the auditor may refer to

- Fiscal Service's CARS website at https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars (accessed May 29, 2026);
- Fiscal Service's FBWT website at https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars/fund-balance-with-treasury (accessed May 29, 2026);

[34]Detailed requirements can be found at https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars/types-of-reconciliations-agencies (accessed May 29, 2026).

[35]A non-Treasury Disbursing Office is a U.S. government entity other than Fiscal Service that is authorized to issue U.S. government payments. The Federal Reserve Bank systems that process the collections and disbursements (e.g., Direct Voucher System, Enterprise Accounting System, etc.) provide unique identifying information that can be used to reconcile the activity.

- Treasury Financial Manual, Volume I, Part II, Chapter 5100, *Fund Balance with Treasury Accounts*, at https://tfx.treasury.gov/tfm/volume1/part2/chapter-5100-fund-balance-treasury-accounts (accessed May 29, 2026);
- *FAST Book* at https://tfx.treasury.gov/reference-books/fast-book (accessed May 29, 2026);
- Fiscal Service's BETC listing and guidance at https://fiscal.treasury.gov/accounting/central-accounting-reporting-system-cars/faqs (accessed May 29, 2026)
- OMB Circular No. A-136, *Financial Reporting Requirements*;
- SFFAS 1, *Accounting for Selected Assets and Liabilities*;
- SFFAS 24, *Selected Standards for the Consolidated Financial Report of the United States Government,* and
- entity accounting policies and procedures for FBWT accounts.

Audit Issues

.18 Ineffective processes and controls over FBWT accounts may result in material misstatements in the amount of funds available for expenditure from each appropriation or may result in an entity's disbursements exceeding appropriated amounts.[36] For example, entities may not have effective processes to properly record and reconcile collection and disbursement activity by TAS, may arbitrarily adjust accounts to the amounts reported by Treasury, or may record differences in clearing accounts without adequately researching their causes. Unreconciled differences recorded in clearing accounts represent transactions that the entity has not properly recorded to the appropriate accounts. Additionally, an entity's failure to reconcile its FBWT accounts timely makes it more difficult to identify and resolve intragovernmental differences as time passes and to identify erroneous or fraudulent transactions in time for the entity to take appropriate actions.

.19 Entities' implementation of CARS reporting has varied. Most entities have transitioned to full-CARS reporting for their daily collection and disbursement activities. However, for entities that continue to report transactions to CARS monthly, there is increased audit risk associated with FBWT as entities resolve outstanding Statements of Differences, which result from differences between amounts reported by the (1) source systems (e.g., Collection Information Repository (CIR), Payment Information Repository (PIR), etc.) and (2) monthly submissions by entities.

.20 Most of the transaction data reported to CARS from the source systems (e.g., CIR, PIR, etc.) include TAS and BETC classification information necessary to populate the line items of the Cash Statement. However, certain entities report TAS and BETC classification information to CARS for their transaction data separate from the information reported from the source systems. In addition,

[36]See also FAM 803 for testing an entity's compliance with the Antideficiency Act.

entities may submit reclassifications to transaction data previously reported to CARS at a summary level.[37]

Audit Procedures

.21 Since FBWT is an intragovernmental item, except for fiduciary or other nonfederal non-entity FBWT, auditors should incorporate FBWT as part of procedures for auditing intragovernmental activity and balances (see FAM 902). For examples of FBWT audit procedures, see FAM 921 A.

.22 As discussed in FAM 921.06, determining the appropriateness of TASs and BETCs assigned to FBWT transactions is essential to determining whether entities' financial statements are consistent with the U.S. government's consolidated financial statements, including the Cash Statement and the budget receipts and outlays included therein. For examples of audit procedures that the auditor may perform to determine the appropriateness of TASs and BETCs, see FAM 921 B.

[37]Fiscal Service developed a remediation plan to address its inability to readily trace the final TAS and BETC classification to the original transaction reported by a source system. Fiscal Service also met with entities to gain an understanding of their ability to provide reclassification information at the proper level of detail to achieve traceability to the original transactions. Fiscal Service also plans to improve the reclassification submission process within CARS to reasonably assure that entities report reclassification data at the appropriate detailed level.

921 A – Example Audit Procedures for Fund Balance with Treasury

Procedures	Initials/date	Doc. ref.
I. Planning and Internal Control Phase		
1) To obtain an understanding of the entity's environment, internal control over fund balance with Treasury (FBWT) accounting, and reconciliation process in the planning and internal control phase of the audit:		
a) Identify the entity's FBWT accounting and reporting policies and procedures and applicable accounting guidance.		
b) Read prior-year audit documentation, financial statements, and related audit reports to determine if there were any audit issues, matters for further consideration, significant deficiencies, or material weaknesses related to FBWT.		
c) Identify FBWT general ledger accounts and analytically review with prior-year data.		
d) Interview key entity staff about their FBWT procedures and controls.		
e) Determine how, in conjunction with work performed on other audit cycles, the entity processes FBWT collections and disbursements, either through Treasury Disbursing Offices, entity disbursing centers, Federal Reserve Bank systems, or a combination of these.		
f) Obtain an understanding of the significant financial management systems and relevant internal controls, including information system controls, used in reporting and accounting for FBWT activity and balances.		
g) Identify and document relevant control activities related to FBWT and determine whether they have been implemented (see FAM 350), such as through the following audit procedures.		
i. Obtain an understanding of the CARS reporting processes and procedures, including how the entity reports increases (such as receipts and collections) and decreases (such as disbursements and investments) to CARS.		

Procedures	Initials/date	Doc. ref.
ii. Obtain an understanding and walk through entity internal controls over its FBWT reconciliation process for FBWT balances and FBWT activity, including procedures for aging and timely resolving unreconciled differences, and determine whether reconciliation controls have been implemented effectively.		
iii. Identify clearing accounts that the entity uses to report unreconciled differences and determine if transactions are classified to the proper accounts in a timely manner.		
iv. Obtain an understanding of the entity's procedures for recording and tracking adjustments to clearing accounts and assess the effect of clearing account balances on the entity's FBWT at fiscal year-end.		
v. Determine whether the entity is properly accounting for the FBWT line item in accordance with U.S. GAAP (see FAM 2010, *Federal Financial Reporting Checklist*.)		
h) Document results in a cycle memo, walk-through, specific control evaluation (SCE) worksheet, line item risk analysis (LIRA) form, matter for further consideration, or other documents as appropriate.		
II. Testing Phase		
1) In the testing phase of the audit, perform control tests to assess the operating effectiveness of relevant control activities related to FBWT that have been implemented (including the controls over the areas in steps 1 a–e below) and perform substantive procedures to gather sufficient, appropriate audit evidence to determine whether the entity: a) Properly and timely records and reports collection and disbursement activity in its FBWT accounts, including: i. Whether the entity records FBWT collection and disbursement transactions in the appropriate FBWT accounts in the entity's general ledger. (This step may be done in conjunction with work performed on other cycles. Review entity FBWT general ledger account records for all entity TASs and Agency Location Codes to identify any recorded transactions that were not included in testing in conjunction with other cycles and, if transactions were not included, determine whether additional transaction testing is needed.)		

Procedures	Initials/date	Doc. ref.
ii. Whether the entity recorded nonexpenditure transactions that affect FBWT (e.g., appropriation warrants, transfers, rescissions, and credit reform) in the appropriate FBWT accounts and investigated significant differences found. (This step may be done in conjunction with work performed on other cycles.)		
b) Timely investigates FBWT balances recorded to clearing TASs and classifies the balances to the proper TASs in the entity's general ledger and CARS.		
c) Periodically and at year-end, reconciles its FBWT account balance and activity, including: i. Reconciling FBWT collection and disbursement activity with CARS, collection systems, Treasury Disbursing Offices, the entity disbursing center, the Federal Reserve Bank system, or other reporting sources, depending on the entity's processes. (This step may be done in conjunction with work performed on other cycles.) ii. Reconciling FBWT balance with CARS. iii. Researching and resolving the underlying causes of differences between Treasury FBWT reports (such as CARS FBWT Account Statements) and entity records (including the collection and disbursement activity flowing through the FBWT accounts and the account balances each month) and reviewing and making any needed adjustments timely.		
d) Appropriately records and reviews any adjusting journal vouchers recorded to FBWT accounts.		
e) Discloses the status of accounts, such as open, expired, or canceled, and whether each account is appropriately included in the FBWT line item.[38]		
2) Perform procedures to determine the materiality of gross unreconciled differences and clearing account balances by analyzing the aggregate absolute values and resulting effect on the financial statements. (As each difference represents a		

[38]The cancellation of expired appropriations reduces an entity's FBWT. An expired account holds expired budget authority. The expired budget authority retains its fiscal year (or multiyear) identity for an additional 5 fiscal years. After the 5-year period has elapsed, all obligated and unobligated balances are canceled, the expired account is closed, and all remaining funds are returned to the General Fund and are thereafter no longer available for any purpose.

Procedures	Initials/date	Doc. ref.
potential misstatement, the roll-up and netting of debits and credits can significantly understate the total outstanding differences.) Evaluate the significance of these unreconciled differences, clearing, suspense, and default account balances to the entity's financial statements and consider additional follow-up, testing, and appropriate note disclosures, as necessary.		
III. Reporting Phase		
1) Prepare lead schedule of general ledger accounts that constitute FBWT.		
2) To assess whether the presentation of the financial statements and note disclosures for the FBWT line item are in accordance with U.S. GAAP, determine whether the entity has done the following:		
a) Disclosed and explained material unreconciled differences in the note disclosures.		
b) Disclosed material unreconciled differences that were written off by the entity during the fiscal year in the note disclosures.		
c) Disclosed material restrictions.		
d) Recorded the auditor's proposed audit adjustments or, if the adjustments are immaterial, included the amounts in the summary of uncorrected misstatements attached to the management representation letter (see FAM 1001).		
e) Completed the portion of the FAM 2010, *Federal Financial Reporting Checklist*, related to FBWT.		
3) Document the results in a summary memo or other document as appropriate.		
4) As necessary, complete other audit procedures for FBWT, including tests of entity • fund controls, • cash on deposit bank accounts and petty cash (imprest) funds, • steps to test the specific requirements or compliance with selected provisions of applicable laws and regulations related to certain types of FBWT accounts, • reconciliations of proprietary and budgetary amounts, and • year-end reporting to Treasury and OMB.		
Note: These audit procedures are not intended to be all inclusive.		

921 B – Example Audit Procedures for Auditing TAS and BETC

Procedures	Initials/ date	Doc. ref.
I. Planning and Internal Control Phase		
1) To obtain an understanding of the entity's CARS reporting processes and procedures: a) Determine how, in conjunction with work performed on other audit cycles, the entity assigns TASs and BETCs to FBWT activity in CARS, including		
i. how the entity uses its invoice processing systems, Treasury collection reporting systems, G-Invoicing, and the IPAC system to assign TASs and BETCs to FBWT activity;		
ii. whether the entity relies on IS controls to assign TASs and BETCs to FBWT activity in its general ledger or CARS; and		
iii. to what extent the entity relies on service organizations to assign TASs and BETCs to FBWT activity in the entity's general ledger or in CARS via initiating transactions or reclassifying existing TASs and BETCs on behalf of the entity.		
b) Identify and document relevant control activities related to assigning appropriate TASs and BETCs and determine whether they have been implemented (see FAM 350). Procedures for identifying relevant control activities related to accuracy and determining whether they have been implemented may include the following.		
i. Perform a walk-through of the entity's FBWT reconciliation by TAS and BETC.		
ii. Review entity policies and procedures relevant to assigning TASs and BETCs to FBWT activity and, if relevant, reclassifying FBWT activity with appropriate TASs and BETCs in CARS. For example, the entity may use a default TAS and BETC for all disbursement transactions and may need to review the activity to determine if some		

Procedures	Initials/ date	Doc. ref.
transactions need to be reclassified to different TAS or BETC.		
iii. Interview key entity staff about their TAS and BETC assignment and reclassification procedures and controls.		
c) Document results in a cycle memo, walk-through, matter for further consideration, or other documents as appropriate.		
II. Testing Phase		
1) In the testing phase of the audit, perform control testing to assess the operating effectiveness of relevant control activities that have been implemented (including the controls over the areas in steps 1 a–b below), and perform substantive procedures to gather sufficient appropriate audit evidence to determine whether the entity does the following: a) Properly and timely assigns appropriate TASs and BETCs to its collection and disbursement activity in CARS. Assigning an appropriate TAS includes the TAS components, including the agency identifier, period of availability, and main account code. (This step may be done in conjunction with work performed on other cycles.) The auditor may: i. Review the entity's cash flow profiles, C-Keys, and TAS and BETC combinations to determine whether they are appropriate based on transaction type, the *FAST Book*, and Treasury's BETC guidance. ii. Test controls over assigning appropriate TASs and BETCs to disbursements through the entity's invoice processing systems. iii. Assess the appropriateness of TASs and BETCs assigned to FBWT transactions (including collections, nonpayroll costs, and payroll costs) in CARS through substantive testing of a nonstatistical selection of transactions or by using samples selected for testing by other cycles. Determining whether FBWT is recorded to the appropriate TAS may also be tested as part of budget information (FAM 495 B) or compliance with the Antideficiency Act (FAM 803).		

Procedures	Initials/ date	Doc. ref.
Note: Consider the need to remove FBWT transactions reported that do not originate from source systems (e.g., CIR, PIR, etc.), including reclassifications, from this testing, as discussed in FAM 921.13. (1) To determine the nature and timing of the transaction, supporting documentation may include the following: • For collections: check, wire, or CIR report • For nonpayroll transactions: obligating document, invoice, purchase card statement, or travel voucher • For payroll transactions: time and attendance sheet, Notification of Personnel Action (SF-50), and Request for Personnel Action (SF-52) (2) To determine the appropriate TAS, supporting documentation may include the *FAST Book* and the appropriation law. (3) To determine the appropriate BETC, supporting documentation may include Treasury's BETC guidance.		
b) Periodically and at year-end, reconciles its FBWT account activity with CARS, including activity by TAS and BETC. Researches and resolves the underlying causes of differences between CARS and entity records, and reviews and makes any needed adjustments in CARS timely.		
2) Evaluate the significance of misstatements at the TAS/BETC level using the materiality used to evaluate FBWT misstatements and consider additional follow-up, testing, and appropriate note disclosures, as necessary.		
3) Document the results in a summary memo or other document, as appropriate.		

931 – Auditing PP&E Land and Stewardship Land

.01 SFFAS 59, *Accounting and Reporting of Government Land*, as clarified by Technical Bulletin (TB) 2025-1, *Technical Clarifications: SFFAS 59, Accounting and Reporting of Government Land*, addresses the reporting of property, plant, and equipment (PP&E) land and permanent land rights (referred to as PP&E land), as well as the reporting of stewardship land and permanent land rights (referred to as stewardship land).[39]

a. **PP&E land** includes land acquired for or in connection with other PP&E for construction purposes. PP&E land excludes withdrawn public lands or land restricted for conservation, preservation, historical, or other like restrictions.

b. **Stewardship land** includes public domain and land owned by the federal government, intended to be held indefinitely. Examples of stewardship land include land used as forest lands and national parks and for wildlife and grazing. It excludes natural resources (e.g., minerals, timber, and petroleum) related to the land.

.02 SFFAS 59 requires PP&E land and stewardship land to be reported using estimated acres.[40] FASAB has stated that it (1) does not seek exact precision in determining estimated acres or predominant use assessments and (2) does not intend to direct or prescribe the use of any particular approach. This guidance refers to estimated acres as "acres" or "acreage."

SFFAS 59 requirements include reporting the following in a note disclosure:

a. Acres of PP&E land and stewardship land.

b. Within each category of PP&E land and stewardship land, estimated acres by three predominant use subcategories—conservation and preservation land, operational land, and commercial use land.[41]

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[39]Land is the solid part of the surface of the earth and excludes natural resources related to land (i.e., depletable resources such as mineral deposits and petroleum, renewable resources such as timber, and the outer continental shelf resources). Land rights are interests and privileges held by the entity in land owned by others, such as leaseholds, easements, water and waterpower rights, diversion rights, submersion rights, rights-of-way, and other like interests in land. Land rights, such as easements or rights-of-way, for an unspecified period of time or unlimited duration are considered permanent land rights. Temporary land rights are for a specified period of time or limited duration.

[40]SFFAS 59 does not apply to (1) land held in trust or administered on behalf of Indian tribal governments or individual Indian land or (2) the outer continental shelf (i.e., the seabed, subsoil, and energy or mineral resources derived therefrom).

[41]Predominant use is the major or primary current use of an asset during the reporting period and does not include incidental or infrequent uses of the asset. Moreover, predominant use can change between reporting periods. An asset's predominant use should be consistent with the entity's authorizing legislation but may not always be consistent with the original intent or reason why the asset was initially acquired. See SFFAS 59, para. 6. Though they are separate categories, conservation and preservation land are closely linked. Each involves a certain type or degree of protection. Specifically, conservation is generally associated with the protection and proper use of natural resources, whereas preservation is associated with the protection of buildings, objects, and landscapes. Operational land is used for land and land rights that have general or administrative purposes. Commercial use land is used where land and permanent land rights generate inflows of resources derived from the land itself or activities that nonfederal third parties perform on the land, usually through special use permits, right-of-way grants, and leases. See SFFAS 59, app. B, Illustrations, for specific examples of all three predominant use subcategories.

c. Acres of PP&E land and stewardship land held for disposal or exchange.

d. Land rights information, whether such rights are permanent or temporary, and amounts paid during the year to maintain such rights.

.03 There are many complexities associated with federal land. The history of U.S. land includes territory ceded by the original 13 colonies, territorial annexations, land purchases, and land acquired by treaty. In SFFAS 59 and TB 2025-1, FASAB addressed concerns associated with federal entities having corroborating documents to support federal ownership of PP&E land and stewardship land. Early acquisitions and disposals of federal land were not documented like modern land transactions. Land records and detailed listings from early periods of the nation's history may not exist. FASAB concluded that "management's assertions concerning land ownership and its related estimates of acres of land and permanent land rights must be based on non-traditional supporting documentation and reasonable acre estimates, respectively."

.04 SFFAS 59 also states that the preparer should determine the level of aggregation of land and permanent land rights that it uses to decide predominant use by considering the entity's mission, types of land use, and how it manages those assets. For example, the entity may determine that predominant use is determined by national park or forest. Further, the entity may determine that the predominant use of a national park or forest is conservation and preservation, even though some uses of the national park or forest are for operational or commercial use but are not predominant uses.

.05 To understand the accounting and reporting requirements of PP&E land and stewardship land, refer to the following, as appropriate.

a. SFFAS 59, *Accounting and Reporting of Government Land*

b. SFFAS 6, *Accounting for Property, Plant, and Equipment*

c. SFFAS 29, *Heritage Assets and Stewardship Land*

d. TB 2025-1, *Technical Clarifications: SFFAS 59, Accounting and Reporting of Government Land*[42]

e. Office of Management and Budget (OMB) Circular No. A-136, *Financial Reporting Requirements*[43]

Audit Procedures

.06 The auditor should determine whether land is material to the entity and document that determination. In making this determination, the auditor considers the significance of land acreage to the entity and relevant factors, including how land is used in operations, whether it is important to the entity's operations or its mission, whether it drives major expenses of the entity, and whether it provides certain revenue to the entity.

[42]TB 2025-1 provides guidance on, among other things, (1) PP&E land and stewardship land categorization (based on acquisition as well as intended use), (2) reporting submerged land, and (3) ownership and supporting documentation when there may be de facto ownership without title documentation. It also includes disclosure requirements for entities with significant submerged non-outer continental shelf land.

[43]OMB reporting guidance in OMB Circular No. A-136 is updated annually. Users should refer to the OMB reporting guidance applicable to the current financial audit.

.07 The auditor's procedures for land are organized into the FAM phases—planning, internal control, testing, and reporting.

Planning Phase

.08 In the planning phase of the audit, the auditor should do the following:

a. Understand significant accounting, auditing, and reporting issues for PP&E land and stewardship land, such as those reported by management or their contractors and by auditors.

b. Understand the entity's policies, processes, methodologies, and information systems for

- maintaining information on land, including how land relates to the entity's mission;
- classifying acreage into PP&E land or stewardship land;
- estimating acreage;
- summarizing and reconciling acreage of PP&E land and stewardship land to underlying records;
- determining the level of aggregation the entity used to categorize acreage into predominant use subcategories;
- categorizing acreage into predominant use subcategories;
- identifying and recording land activity;[44]
- identifying land held for disposal or exchange;
- identifying changes between reporting periods in the predominant use of land and recording those changes to the predominant use subcategories; and
- reporting land rights information, whether such rights are permanent or temporary, and amounts paid to maintain such rights.

.09 The auditor should determine materiality levels for total land acreage (PP&E land and stewardship land) for purposes of planning and performing audit procedures related to reported land information.

a. **Materiality.** The auditor should generally use 5 percent of total land acreage as materiality but may reduce materiality based on professional judgment.

b. **Performance materiality.** The auditor should set performance materiality to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for land.

c. **Tolerable misstatement.** Based on professional judgment, the auditor may set tolerable misstatement equal to or less than performance materiality and may establish different quantities of tolerable misstatement for substantive sampling procedures of PP&E land and stewardship land.

[44]Land activity is defined as increases and decreases in acreage that result from acquisition, transfer, land swap, donation, land grant, eminent domain, or other means, such as sales or adjustments based on land surveys that occur during the reporting period.

.10 For (1) total acreage of PP&E land, including the entity's categorization of acreage by predominant use subcategory and (2) total acreage of stewardship land, including the entity's categorization of acreage by predominant use subcategory, the auditor should identify risks of material misstatement at the assertion level (see table 931.1 for land-related assertions). For each identified risk of material misstatement at the assertion level, the auditor should assess inherent risk at remote, low, moderate, or high, considering relevant inherent risk factors (see FAM 265.25). Inherent risk factors may include (1) the complexity of implementing a new standard based on acreage estimates; (2) the development of estimates and new methodologies based on management judgment; and (3) new or repurposed information systems that may not adequately support the activities related to acquiring, disposing, maintaining, and tracking estimated acreage of land.

.11 The auditor's documentation of the planning phase should follow the requirements in FAM 290, as applicable.

Internal Control Phase

.12 For each identified risk of material misstatement at the assertion level for which inherent risk is more than remote, the auditor should identify the control objectives that could prevent, or detect and correct, the potential misstatement. For each control objective identified, the auditor should identify the control activities that, if effectively designed, implemented, and operating, would allow management to achieve the control objective. See FAM 340.

.13 Table 931.1 provides guidance on identifying control activities for each assertion (existence, occurrence, completeness, accuracy, rights, and presentation), as well as segregation of duties, and related control objective(s).

Table 931.1: Identifying Control Activities for PP&E Land and Stewardship Land

Assertion/ segregation of duties	Control objective	Identifying control activities
Existence 1. Recorded land exists at a given date.[a]	**Balance**	
	a. Land exists at a given date.	• How does the entity reasonably assure that land (i.e., parcel or unit of land) in underlying land records exists?[b] • If applicable, how does the entity reasonably assure that it does not include, if material, land that is managed and reported by another federal entity?
	b. Land is properly classified in the entity's records between PP&E land and stewardship land.	• How does the entity reasonably assure that land is properly classified as PP&E land or stewardship land? • What are the entity's policies and procedures to reasonably assure the recording and classifying of PP&E land and stewardship land?
Occurrence 2. Recorded land activity and events occurred and pertain to the entity.	**Activity**	
	Recorded land activity and events actually occurred and pertain to the entity.	• How does the entity reasonably assure that recorded land activity and events are authorized by federal laws, regulations, and management policy? • How does the entity reasonably assure that appropriate individuals approve land activity and events (i.e., acquiring and disposing of PP&E land and stewardship land) in accordance with management's policy? • How does the entity reasonably assure that land activity and events recorded in the current period occurred and are properly classified as PP&E land or stewardship land?
Completeness 1. All land that should have been recorded as PP&E land and stewardship land is recorded in the proper period.	**Balance**	
	PP&E land and stewardship land that should have been recorded is recorded in the proper period.	• How does the entity reasonably assure that underlying records of land are reconciled to reported land? • How does the entity reasonably assure that it periodically reconciles documentation of land under the entity's management or control with the entity's recorded land?
2. All land activity and events that should have been recorded are recorded in the period.	**Activity**	
	a. All valid land activity and events for land are recorded.	• How does the entity reasonably assure that all valid PP&E land and stewardship land activity and events are appropriately recorded as PP&E land and stewardship land?
	b. All land activity and events that occurred in the current period are recorded in the current period.	• How does the entity reasonably assure that activity and events for PP&E land and stewardship land that occurred in the current period are recorded in the current period?
Accuracy 1. Land acreage is recorded at appropriate amounts.	**Balance**	
	a. Land acreage is recorded at appropriate amounts.	• How does the entity reasonably assure that acreage for PP&E land and stewardship land is appropriate? • What are the entity's policies and procedures for conducting surveys of land acreage to determine the recorded acreage in the underlying records?

Table 931.1: Identifying Control Activities for PP&E Land and Stewardship Land

Assertion/ segregation of duties	Control objective	Identifying control activities
	b. Reported land acreage is supported by underlying records that are accurately summarized and reconciled.	• How does the entity reasonably assure that summarized underlying records of land acreage are reconciled to reported land acreage? • How does the entity reasonably assure that it properly categorizes land and other numerical information into predominant use subcategories in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136?
2. Amounts and other data relating to recorded land acreage activity and events have been appropriately recorded.	**Activity**	
	Amounts and other data relating to recorded land acreage activity and events have been appropriately recorded.	• How does the entity reasonably assure that the land acreage activity and events are supported by documentation and have been appropriately recorded? • How does the entity reasonably assure that the activity for land acreage reported during the current period is summarized and reconciled?
Rights 1. The federal government has rights to the land, and the entity has been assigned responsibility for managing and reporting the land.	**Balance**	
	The federal government has rights to the land, and the entity has been assigned responsibility for managing and reporting the land.	• How does the entity reasonably assure that PP&E land and stewardship land are supported by documentation that provides evidence of federal ownership or the federal government's interest in land rights? • How does the entity reasonably assure that PP&E land and stewardship land are supported by documentation indicating that the entity has been assigned responsibility for managing and reporting the land?
Presentation 1. The note disclosure narrative is appropriately and clearly presented in accordance SFFAS 59, TB 2025-1, and OMB Circular A-136.	**Balance**	
	The note disclosure narrative is appropriately and clearly presented in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136.	• How does the entity reasonably assure that its note disclosure narrative for land is appropriately and clearly presented in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136?
2. Numerical and other information for land presented in the note disclosure is appropriately aggregated or disaggregated and clearly described in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136.	Numerical and other information relating to land presented in the note disclosure is appropriately aggregated or disaggregated and is clearly described in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136.	• How does the entity reasonably assure that its presentation of numerical and other information for land in the note disclosure is appropriately aggregated or disaggregated and clearly described in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136?[c]
3. Numerical and other information for land is in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136 and consistently applied.	Numerical and other information for land is in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136 and consistently applied from period to period.	• How does the entity reasonably assure that numerical and other information for land is presented in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136 and consistently applied?

Table 931.1: Identifying Control Activities for PP&E Land and Stewardship Land

Assertion/ segregation of duties	Control objective	Identifying control activities
4. Numerical and other information is appropriately measured and described and is relevant and understandable in the context of the requirements of SFFAS 59, TB 2025-1, and OMB Circular A-136. All numerical and other information that should have been included in the note disclosure has been included.	Numerical and other information is appropriately measured and described and is relevant and understandable in the context of the requirements of SFFAS 59, TB 2025-1, and OMB Circular A-136. All numerical and other information that should have been included in the note disclosure has been included.	• How does the entity reasonably assure that numerical and other information is appropriately measured and described and is relevant and understandable in the context of the requirements of SFFAS 59, TB 2025-1, and OMB Circular A-136? • How does the entity reasonably assure that all numerical and other information that should have been included in the note disclosure has been included?
Segregation of duties	**Activity**	
	Persons do not have uncontrolled access to land records; they are not assigned duties that would allow them to both commit and conceal errors or fraud.	• How does the entity assign and approve appropriate access to land records to reasonably assure there is no uncontrolled access?

[a]Land includes permanent land rights.

[b]There may be control activities that address multiple assertions (e.g., existence, accuracy, and rights).

[c]The entity should determine the level of aggregation of PP&E land and stewardship land by factors including the entity's mission, types of land use, and how it manages the land. It would be helpful if the entity documented the rationale for its approach to aggregation.

.14 The auditor should evaluate the design, implementation, and operating effectiveness of the control activities identified following the guidance in FAM 340, 350, and 360.

.15 The auditor should determine whether internal control provides reasonable assurance that control objectives are achieved. For each control objective that is not achieved, the auditor should obtain sufficient information to identify the underlying internal control deficiencies and report such control deficiencies to management. For each identified risk of material misstatement for which inherent risk is more than remote, the auditor should preliminarily assess control risk and the risk of material misstatement and reevaluate this assessment after completing the testing phase. See FAM 370.

.16 The auditor should prepare or update the cycle memorandum, flowchart, LIRA form, and SCE worksheet, as applicable. See FAM 390, 395 H, and 395 G.

Testing Phase

.17 For PP&E land and stewardship land, the auditor should determine the significant assertions, which are those that have one or more identified risks of material misstatement for which inherent risk is more than remote. For each significant assertion, the auditor should perform substantive testing procedures using one of two approaches:

a. testing the current-year ending balance or

b. testing the current-year activity if the auditor has evidence that the beginning balance is correct.

In substantive testing, the auditor considers materiality and risk of material misstatement related to land. See FAM 470.

.18 Below is guidance on substantive testing procedures for testing PP&E land and stewardship land balance and activity. The auditor should exercise professional judgment in determining the extent of audit procedures on the balance and activity. Once the auditor obtains sufficient audit evidence to conclude that the land acreage beginning balance (prior-year ending balance) is fairly stated, the auditor may decide to focus primarily on testing the current year's land activity and perform more limited procedures on the ending balance, as the land information generally does not significantly change absent significant acquisitions, dispositions, or transfers.

Balance Testing

.19 When testing the land balance, the auditor may perform substantive testing as provided in table 931.2 for each significant assertion. Depending on the nature of an entity's land records, land units selected for testing may be

a. aggregated land units used to determine predominant use,

b. other appropriate land aggregation, or

c. individual land parcels.

If aggregated land units are used, the auditor may make a sub-selection of individual units for testing existence, accuracy, and rights based on the auditor's consideration of the effectiveness and efficiency of such testing.

If permanent land rights are included in separate records and deemed material, the auditor may make a separate selection of those records and perform the tests shown in table 931.2.

Table 931.2: Substantive Testing of PP&E Land and Stewardship Land Balance

Assertion	Substantive tests
Existence	• For each selected item of recorded land, determine whether the existence of the land is supported by sufficient and appropriate evidence.[a]
Completeness	• Identify land that the entity manages and should be recorded through inquiry of program managers or other means and determine whether the land is properly included in the entity's land records.
Accuracy	• For each selected item of recorded land, determine whether the estimate of the acreage is reasonable based on examination of related records. Entity estimates can be based on different underlying sources of data with different measurement and mapping methods. They can be applied at an aggregation level (for example, by national park or reserve, regional/district office, or topography/land cover). (TB 2025-1, para. 15) Such records may include traditional records to verify ownership, geospatial mapping, historical records, surveys, plats, or any combination of these (SFFAS 59, para. A35).
Rights	• For each selected item of recorded land, examine evidence that supports federal ownership of land or the federal government's interest in land rights. Such documents could include original property records or other documentation like deeds, tax assessments, or insurance records. When original property records do not exist, alternative documentation, such as renovation contracts, historical maintenance records, a history of payment of invoices, minutes of meetings, historical databases, surveys of land records, a history of past/historical practices (like establishing de facto ownership), or other relevant sources of information, may provide acceptable alternative evidence of ownership. (TB 2025-1, para. 17) • For each selected item of recorded land, compare the recorded land to source documentation to confirm that the entity has been assigned responsibility for managing the land.
Presentation	• Determine whether the entity's note disclosure narrative for land is appropriately and clearly presented and described in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136. • Determine whether the reported land information for acreage and its aggregation into the predominant use subcategories agree with the underlying records and reports. • For each selected item of recorded land, determine whether the classification of acreage for the related predominant use subcategory is supported by sufficient, appropriate evidence based on the entity's mission, how the entity views the PP&E land and stewardship land for management purposes, and materiality considerations. • For each selected item of recorded land, determine whether the predominant use is the major or primary current use of PP&E land and stewardship land at the end of the reporting period and is not based on incidental or infrequent uses of that land. • For each selected item of recorded land, determine whether the predominant use is consistent with the entity's authorizing legislation. Note that the predominant use may not always be consistent with the original intent or reason why the land was initially acquired and can change between reporting periods. • Determine whether the aggregation of the data for the predominant use subcategories is appropriate.

[a]There may be forms of evidence that address multiple assertions (e.g., existence, accuracy, and rights).

Activity Testing

.20 The auditor should obtain a reconciliation of changes in acreage of PP&E land and stewardship land (i.e., opening acreage, increases, decreases, changes in category between PP&E land and stewardship land, changes in predominant use, and ending acreage).

.21 To substantively test land activity for each significant assertion, the auditor may do the following:

a. Select items from a population of land activity during the year for substantive testing.

b. Perform substantive testing of activity described in table 931.3.

Table 931.3: Substantive Testing of PP&E Land and Stewardship Land Activity

Assertion	Type of test
Occurrence	• For each selected item of recorded land activity and events, determine whether the recorded acreage activity is supported by sufficient, appropriate evidence.
Completeness	• Review the reconciliations of the PP&E land's and stewardship land's beginning balances, activity during the period, and ending balances for the current period. Trace the beginning and ending balances to the recorded PP&E land and stewardship land. • Identify land activity and events that occurred during the period through inquiry of legal counsel and program managers and determine whether the land activity and events were properly recorded in the land records.
Accuracy	• For each selected item of recorded land activity and events, determine whether the estimate of the acreage is reasonable based on examination of related records. Entity estimates can be based on different underlying sources of data with different measurement and mapping methods. They can be applied at an aggregation level (for example, by national park or reserve, regional/district office, or topography/land cover). (TB 2025-1, para. 15) Such records may include traditional records to verify ownership, geospatial mapping, historical records, surveys, plats, or any combination of these (SFFAS 59, para. A35).
Rights	• For each selected item of recorded land activity and events that relate to increases to land during the period, examine evidence that supports federal ownership of land or the federal government's interest in land rights. Such documents could include original property records or other documentation like deeds, tax assessments, or insurance records. When original property records do not exist, alternative documentation, such as renovation contracts, historical maintenance records, a history of payment of invoices, minutes of meetings, historical databases, surveys of land records, a history of past/historical practices (like establishing de facto ownership), or other relevant sources of information, may provide acceptable alternative evidence of ownership. (TB 2025-1, para. 17) • For each selected item of recorded land activity and events that relate to increases to land during the period, compare the recorded land activity and events to source documentation to confirm that the entity has been assigned responsibility for managing the land.

Assertion	Type of test
Presentation	• Determine whether the entity's note disclosure narrative is appropriately and clearly presented in accordance with SFFAS 59, TB 2025-1, and OMB Circular A- 136. • Determine whether the reported land information for acreage and its aggregation into the predominant use subcategories agree with the underlying records and reports. • For each selected item of recorded land activity and events, determine whether the classification of acreage for the related predominant use subcategory is supported by sufficient, appropriate evidence based on the entity's mission, how the entity views the PP&E land and stewardship land for management purposes, and materiality considerations. • For each selected item of recorded land activity and events that relate to increases, determine whether the predominant use is the major or primary current use of PP&E land and stewardship land during the reporting period and does not include incidental or infrequent uses of that land. • For each selected item of recorded land activity and events that relate to increases, determine whether the predominant use is consistent with the entity's authorizing legislation. Note that the predominant use may not always be consistent with the original intent or reason why the land was initially acquired and can change between reporting periods.

.22 The auditor might detect misstatements when performing substantive tests or other procedures discussed above. The auditor should accumulate misstatements identified during those procedures, other than those that are clearly trivial (see FAM 595 C). The auditor should refer to FAM 530 and 540 for the evaluation and other factors to consider.

.23 The auditor's documentation of the testing phase should follow the requirements in FAM 490, as applicable.

Reporting Phase

.24 To determine the proper reporting, presentation, and disclosure of PP&E land and stewardship land, the auditor should review the appropriate information about acreage and determine whether the acreage, and the categorization of the acreage of PP&E land and stewardship land into predominant use subcategories, is properly reported in accordance with SFFAS 59, TB 2025-1, and OMB Circular A-136.

.25 To assess whether the presentation of the note disclosure for PP&E land and stewardship land is in accordance with U.S. GAAP, the auditor should determine whether the entity has appropriately included the following:

a. A concise statement defining an entity's land and explaining how land relates to the entity's mission.

b. A brief description of the entity's policies for land.

c. Information on land use by subcategory. PP&E land and stewardship land should be assigned to one of three subcategories based on predominant use and reported in estimated acres of land. The three subcategories are commercial use land, conservation and preservation land, and operational land.

d. If applicable, the amount of estimated acres of land held for disposal or exchange and their predominant use.

e. Land rights information should include a general description of the different types of rights acquired by the entity, whether such rights are permanent or temporary, and amounts paid during the year to maintain such rights.

f. If the entity has non-outer continental shelf submerged land, the entity should (1) disclose its policy for including or excluding this land from acreage estimates and (2) describe its mission related to such land.[45]

.26 The auditor's documentation of the reporting phase should follow the requirements in FAM 590, as applicable.

[45]Preparers have the option to include or exclude non-outer continental shelf submerged land estimated acreage in the notes as part of the overall reported acreage estimates (TB 2025-1, para. 8).

932 – Auditing Heritage Assets

.01 Heritage assets are PP&E assets that are unique for one or more of the following reasons:

- historical or natural significance;
- cultural, educational, or artistic (or aesthetic) importance; or
- significant architectural characteristics.

Heritage assets consist of (1) collection-type heritage assets, such as objects gathered and maintained for exhibition, museum collections, art collections, and library collections, and (2) noncollection-type heritage assets, such as parks, memorials, monuments, and buildings. (SFFAS 29, para. 15)

.02 Some investments in heritage assets (e.g., national parks) will also meet the definition of stewardship land and be considered and reported as both heritage assets and stewardship land. Such reporting would not be considered duplication, as the type of information reported by physical unit would be different for each category of stewardship asset (SFFAS 29, para. 17). See FAM 931 for guidance related to PP&E land and stewardship land.

.03 Heritage assets may in some cases be used to serve two purposes—a heritage function and general government operations. In cases where a heritage asset serves two purposes, the heritage asset should be considered a multiuse heritage asset if the predominant use of the asset is in general government operations. For example, the main Treasury building in Washington, D.C., is used primarily as an office building. This multiuse asset would be considered general property, capitalized on the balance sheet, and depreciated. Heritage assets having an incidental use in government operations are not multiuse heritage assets; they are simply heritage assets. (SFFAS 29, paras. 18 and 22)

Accounting and Reporting Information

.04 Per SFFAS 29, *Heritage Assets and Stewardship Land*, entities' balance sheets should reference a note that discloses information about heritage assets, but no dollar amount is shown. See SFFAS 29, paragraphs 25 through 27, for disclosure requirements. Also see Technical Release (TR) 9, *Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land*, for guidance relating to (1) materiality considerations and (2) identification, categorization, and quantification.

.05 SFFAS 29 also includes disclosure requirements applicable to the U.S. government's consolidated financial statements, which must provide a general discussion of heritage assets and direct users to the applicable entities' financial statements for more detailed information (SFFAS 29, para. 28).

Audit Procedures

.06 Heritage assets will vary by entity, and the auditor should use professional judgment to design the audit procedures for a particular entity after considering the types of heritage assets, materiality, audit risks, and the control environment. The auditor should consider whether heritage assets are material (see TR 9, section I, Materiality Considerations).

.07 The audit procedures for heritage assets are organized into the FAM phases—planning, internal control, testing, and reporting.

Planning Phase

.08 The auditor should obtain an understanding of an entity's heritage assets in the planning phase of the audit. To obtain such understanding, the auditor generally should do the following:

a. Obtain an understanding of significant accounting and auditing issues and read the entity's prior-year annual financial report (e.g., performance and accountability report or agency financial report).

b. Read SFFAS 29, as amended; TR 9 (including guidance for materiality considerations); and OMB guidance for accounting and reporting of heritage assets.

c. Understand and document the entity's policies for identifying heritage assets separate from multiuse heritage assets and other PP&E and indicate how the designation of heritage assets relates to the entity's mission.

d. Understand and document the entity's procedures for identifying, categorizing, accounting for, reconciling, and reporting heritage assets. Note that SFFAS 29 and TR 9 allow the entity flexibility in designating categories by determining a meaningful level of aggregation for reporting and selecting physical units aligned with those categories based on the entity's mission and types of heritage assets and how it manages those assets.

e. Understand and document the entity's methodology for acquisition and withdrawal of heritage assets during the reporting period.

f. Identify and understand the significant business process applications and significant manual processes for classifying, categorizing, accounting for, and processing transactions related to heritage assets by interviewing the entity's key personnel to understand the flow of information in the entity's business processes and the information system processing performed by significant business process applications. See FAM 235 and 260 for additional guidance

.09 For heritage assets, the auditor should identify risks of material misstatement at the assertion level. For each identified risk of material misstatement at the assertion level, the auditor should assess inherent risk at remote, low, moderate, or high, considering relevant inherent risk factors (see FAM 265.25).

.10 The auditor's documentation of the planning phase should follow the requirements in FAM 290, as applicable.

Internal Control Phase

.11 For each identified risk of material misstatement at the assertion level for which inherent risk is more than remote, the auditor should identify the control objectives that could prevent, or detect and correct, the potential misstatement. For each control objective identified, the auditor should identify the control activities that, if effectively designed, implemented, and operating, would allow management to achieve the control objective. See FAM 340.

.12 The auditor should evaluate the design, implementation, and operating effectiveness of the control activities identified following guidance in FAM 340, 350, and 360. In identifying and evaluating control activities for heritage assets,

the auditor generally should determine (through inquiries of management, walk-throughs, inspections of documents, reviews of prior years' documentation, and other means applicable to the entity) the entity's process for identifying, classifying, and reporting heritage assets, specifically, the following:

a. Whether the entity has an authorization process and the related control procedures for acquisition and withdrawal transactions related to heritage assets.

b. How the entity has instituted a consistent methodology for categorizing heritage assets based on its mission and in accordance with SFFAS 29 and TR 9.

c. How the entity records acquisitions and withdrawal transactions in its general ledger and performs reconciliations between its general ledger and subsidiary ledger(s) (e.g., asset accountability system). In accordance with SFFAS 29, costs related to the acquisition, improvement, reconstruction, and renovation of heritage assets are recognized in the statement of net cost for the period in which the costs are incurred. These include all costs incurred to prepare the item for its intended use.

d. Whether the entity maintains transaction logs or detailed records of transactions to facilitate the reconciliation process, and whether the logs include sufficient information to enable identification and location of supporting documentation.

e. How the entity classifies and records transfers of heritage assets to and from other federal entities.

f. How the entity classifies and records donation or devise[46] of heritage assets.

g. Whether the entity implements internal control to safeguard collection-type heritage assets.

h. Whether the entity separates and capitalizes multiuse heritage assets. The cost of acquisition, improvement, reconstruction, or renovation of multiuse heritage assets should be capitalized as PP&E and depreciated over its useful life.

i. Whether and how the entity conducts periodic physical inventories designed to verify the existence, location, and condition of all property listed in the accounts and to verify the completeness of recorded units.

.13 The auditor should determine whether internal control provides reasonable assurance that control objectives are achieved. For each control objective that is not achieved, the auditor should obtain sufficient information to identify the underlying internal control deficiencies and report such control deficiencies to management. For each identified risk of material misstatement for which inherent risk is more than remote, the auditor should preliminarily assess control risk and the risk of material misstatement and reevaluate this assessment after completing the testing phase. See FAM 370.

.14 The auditor should prepare or update the cycle memorandum, flowchart, LIRA form, and SCE worksheet, as applicable. See FAM 390, 395 H, and 395 G.

[46]Devise refers to a will or clause of a will disposing of property.

Testing Phase

.15 For heritage assets, the auditor should determine the significant assertions, which are those that have one or more identified risks of material misstatement for which inherent risk is more than remote. For each significant assertion, the auditor should perform substantive procedures. See FAM 470.

.16 The audit objectives for performing substantive procedures on heritage assets are as follows:

a. Determine the existence of recorded heritage assets.

b. Determine the completeness of recorded heritage assets.

c. Determine the entity's ownership rights to record these assets as heritage assets in accordance with SFFAS 29.

d. Determine the clerical accuracy of unit schedules for additions and deletions.

e. Determine that the categorization and aggregation of physical units are in accordance with guidelines established in SFFAS 29 and TR 9.

f. Determine that the presentation and disclosure of heritage assets are in accordance with SFFAS 29.

If the auditor is satisfied with the beginning balance and verifies the acquisitions and withdrawals of the current period, the auditor may have sufficient appropriate evidence about the ending balance.

The auditor's documentation of the testing phase should follow the requirements in FAM 490, as applicable.

.17 **Existence.** To determine the existence of heritage assets, the auditor generally should do the following:

a. Obtain a summary analysis of changes in heritage assets (i.e., beginning balance, additions, deletions, and ending balance) in the current fiscal year and reconcile these to supporting schedules.

b. Test a selection of additions during the year by comparing the additions to the original documentation, such as contracts, deeds, work orders, and invoices.

c. Make physical inspections of a selection of acquisitions. The auditor coordinates physical inspections with the appropriate entity staff, particularly when visiting nonfederal repositories that hold federal museum collections. This will ensure that visits are efficient and productive and that relationships between repositories and the entity are maintained.

d. Examine supporting documents for a selection of withdrawals.

e. For high-value items, consider performing periodic inventory verifications.

.18 **Completeness.** The auditor generally should determine the completeness of recorded heritage assets by tracing transactions recorded in supporting schedules to the asset accountability system. The auditor may also perform additional procedures, such as inquiries and field inspections.

.19 **Accuracy.** To determine the accuracy of unit schedules for heritage assets additions and deletions, the auditor generally should do the following:

a. Agree subsidiary ledger for additions and deletions to controlling accounts and examine detailed supporting documentation.

b. Determine the propriety and accuracy of recorded transfers and donations, examine subsidiary ledgers, and agree them to detailed supporting documentation.

c. Recalculate footings and extensions in detailed documentation and summary analysis.

.20 **Rights and obligations.** To determine the entity's ownership rights to record property as heritage assets, for items selected for additions testing, the auditor generally should examine documentation to determine legal ownership, as appropriate. The supporting documentation used may vary. See discussion of supporting documentation in the basis for conclusions section of SFFAS 29 and guidance in TR 9.

.21 **Classification.** To determine adequacy of the categorization, aggregation, and unitization of physical units for heritage assets, the auditor generally should do the following:

a. Examine entity documentation and methodology to determine whether (1) the categories of heritage assets are reasonable and (2) for each category, the physical units of measure used and the aggregation of the physical units are appropriate, based on the entity's mission, how the entity views the asset for management purposes, types of heritage assets, and materiality considerations.

b. Determine whether the results of testing and the nature of any misstatements indicate the need to reassess the risk of material misstatement and revise procedures.

Reporting Phase

.22 To determine the proper reporting of heritage assets, the auditor should review the balance sheet for the appropriate note reference and determine whether heritage assets are properly reported and correctly classified in this note in accordance with SFFAS 29. The auditor should also determine whether the entity properly reported the following in this note:

a. how the heritage assets relate to the entity's mission;

b. a description of stewardship policies for heritage assets;

c. a description of each major category of heritage asset use;

d. the number of physical units by major category, the number of physical units by major category acquired and withdrawn, and a description of the major methods of acquisition and withdrawal;

e. a discussion of multiuse heritage assets; and

f. a reference to deferred maintenance and repairs information reported as RSI.

.23 The auditor should summarize the results of the reporting phase, determine if adjustments are necessary, and conclude whether heritage assets have been properly reported in the financial statements and notes. The auditor's documentation of the reporting phase should follow the requirements in FAM 590, as applicable.

941 – Auditing the Statement of Social Insurance and the Statement of Changes in Social Insurance Amounts

.01 The Statement of Social Insurance is required to be audited, along with certain social insurance disclosure information, while other social insurance information is to be presented as unaudited RSI. The Statement of Changes in Social Insurance Amounts is required to be audited and reconciles the beginning and ending open group measures presented in the Statement of Social Insurance and presents the components of the changes in the open group measure from the end of the previous reporting period.[47] FAM 941 provides auditors with guidance for auditing the Statement of Social Insurance and the Statement of Changes in Social Insurance Amounts in accordance with GAGAS.[48] Auditors should also see the AICPA Statement of Position (SOP) 04-1, *Auditing the Statement of Social Insurance*, and AU-C 540, *Auditing Accounting Estimates and Related Disclosures*.

.02 FASAB has established accounting requirements for the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts through various SFFAS requirements. The financial statements affected are those of federal entities responsible for Social Security, Medicare, Railroad Retirement, and Black Lung programs (social insurance reporting entities) as well as the U.S. government's consolidated financial statements. For periods beginning after September 30, 2005, the Statement of Social Insurance is to be presented as a financial statement with the underlying significant assumptions included in notes that are presented as an integral part of the financial statements. For periods beginning after September 30, 2010, the Statement of Changes in Social Insurance Amounts is to be presented as a financial statement with the underlying significant changes disclosed on the statement or included in notes that are presented as an integral part of the financial statements.

.03 FASAB standards for social insurance programs require social insurance reporting entities' financial statements and the U.S. government's consolidated financial statements to report the following for the Statement of Social Insurance:

a. the estimated present value of the income/revenue to be received from or on behalf of the following groups during a projection period sufficient to illustrate the long-term sustainability of the social insurance programs for

- current participants who have not yet attained retirement age,
- current participants who have attained retirement age, and
- individuals expected to become participants;

[47]The open group measure is the net present value of all expenditures to or on behalf of the open group population (persons who, as of a valuation date, are or will be participants in a social insurance program) and all contributions or other income/revenue from or on behalf of the open group population over a given projection period.

[48]Collectively, the Statement of Social Insurance, the Statement of Changes in Social Insurance Amounts, and the Statement of Long-Term Fiscal Projections (only applicable at government-wide level) are referred to as sustainability financial statements.

b. the estimated present value of the benefit payments or expenditures to be made during that same period to or on behalf of the groups listed in item (a) above;

c. the estimated net present value of the cash flows during the projection period (the income/revenue described in item (a) above over the expenditures described in item (b) above, or the expenditures described in item (b) above over the income/revenue described in item (a) above);

d. in notes to the Statement of Social Insurance, the following:

i. the accumulated excess of all past cash receipts, including interest on investments, over all past cash disbursements within the social insurance program, represented by the fund balance at the valuation date;

ii. an explanation of how the net present value referred to in item (c) above is calculated for the closed group;[49]

iii. comparative financial information for items (a), (b), (c), and (d)(i) above for the current year and for each of the 4 preceding years; and

iv. the significant assumptions used in preparing the estimates.

.04 FASAB standards for social insurance programs require social insurance reporting entities' financial statements and the U.S. government's consolidated financial statements to report the following for the Statement of Changes in Social Insurance Amounts:

a. The significant components of the changes in the open group measure from the end of the previous reporting period and the amounts associated with each type of change.

b. The reasons for the changes, including explanations of the most significant changes, in notes on the face of the Statement of Changes in Social Insurance Amounts or in the notes that are presented as an integral part of the financial statements.

c. An explanation of the reasons for the most significant changes in the open group measure during the reporting periods in the entity's MD&A. In addition, the entity's MD&A should discuss the closed group measure in the narrative and explain how it differs from the open group measure and the significance of the difference.

Accounting and Reporting Information

.05 FASAB has issued the following standards for reporting on social insurance programs of federal entities.

- **SFFAS 17**, *Accounting for Social Insurance*, effective for periods beginning after September 30, 1999, presents accounting standards for federal social insurance programs covering Social Security (Old-Age, Survivors, and Disability Insurance), Medicare (Hospital Insurance (Part A), Supplementary

[49]The *closed group* is defined as those persons who, as of a valuation date, are participants in a social insurance program as beneficiaries, covered workers, or payers of earmarked taxes or premiums.

Medical Insurance (Part B), and Prescription Drug Benefit (Part D)),[50] Railroad Retirement, and Black Lung benefits and Unemployment Insurance. Social insurance programs covered by SFFAS 17 have five common characteristics:

1. financing from participants or their employers,
2. eligibility from taxes or fees paid and time worked in covered employment,
3. benefits not directly related to taxes or fees paid,
4. benefits prescribed in law, and
5. program intended for the general public.

- **SFFAS 25**, *Reclassification of Stewardship Responsibilities and Eliminating the Current Services Assessment*, requires the Statement of Social Insurance to become an audited financial statement. It also provides that certain information about social insurance programs required by SFFAS 17 be reported in audited notes or as unaudited RSI, rather than as unaudited required supplementary stewardship information. In accordance with SFFAS 28, the effective period was deferred 1 year from fiscal year 2005 to fiscal year 2006.
- **SFFAS 26**, *Presentation of Significant Assumptions for the Statement of Social Insurance: Amending SFFAS 25*, requires that the underlying significant assumptions relating to the Statement of Social Insurance be included in audited notes with other information required by SFFAS 17—including the sensitivity analysis—be presented as RSI, except to the extent that the preparer elects to include some or all of that information in audited notes. In accordance with SFFAS 28, the effective period was deferred 1 year from fiscal year 2005 to fiscal year 2006.
- **SFFAS 28**, *Deferral of the Effective Date of Reclassification of the Statement of Social Insurance: Amending SFFAS 25 and 26*, deferred the effective dates of SFFAS 25 and SFFAS 26 for 1 year to the fiscal year ended September 30, 2006.
- **SFFAS 37**, *Social Insurance: Additional Requirements for Management's Discussion and Analysis and Basic Financial Statements*, effective for periods beginning after September 30, 2010, requires that in addition to the current requirements of SFFAS 17, entities that present a Statement of Social Insurance
  - include in one section of the MD&A information about costs, assets, liabilities, social insurance commitments, budget flows, and long-term fiscal projections;
  - include in the MD&A a table or other singular presentation of key measures drawn from the financial statements;

[50]The Medicare Prescription Drug, Improvement, and Modernization Act of 2003, Pub. L. No. 108-173, 117 Stat. 2066 (Dec. 8, 2003), created a new prescription drug benefit under Medicare Part D, which is also covered by SFFAS 17.

- add a section to the Statement of Social Insurance that summarizes the net present values of cash flows and presents certain subtotals and totals;
- present a Statement of Changes in Social Insurance Amounts that indicates the reasons for the changes in the open group measure from the end of the previous reporting period; and
- when comparative financial statements are presented, presentation of two Statements of Changes in Social Insurance Amounts, one for the current reporting period, and one for the previous reporting period.

SFFAS 17 is amended to conform to changes in SFFAS 37.

.06 Auditors generally should follow the FAM methodology contained in the planning, internal control, testing, and reporting phases in FAM 200 through 500 and the audit guidance included in SOP 04-1 when auditing the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts.[51]

.07 As permitted by AU-C 600A, *Special Considerations – Audits of Group Financial Statements (Including the Work of Component Auditors),* a group auditor may fulfill the requirements of SOP 04-1 by using work that other component auditors have performed in conformity with the provisions of SOP 04-1. For example, for the Old-Age Survivors and Disability Insurance (OASDI) program, the group auditor of the consolidated financial statements of the U.S. government may use the work and report of the component auditor of the Social Security Administration's Statement of Social Insurance and related Statement of Changes in Social Insurance Amounts.

.08 The auditor should obtain sufficient appropriate audit evidence about whether accounting estimates in the financial statements and related note disclosures are reasonable in the context of the applicable financial reporting framework (generally U.S. GAAP) (AU-C 540.10). When obtaining an understanding of the entity and its environment, the applicable financial reporting framework (generally U.S. GAAP), and the entity's internal control, the auditor should obtain an understanding of the matters discussed in FAM 220.14; 260.10, .14, and .20; and 340.03 related to the entity's accounting estimates in order to obtain audit evidence that provides an appropriate basis for identifying and assessing the risks of material misstatement at the financial statement and assertion levels. The Additional Procedures for Certain Risks: Risks Related to Accounting Estimates subsection in FAM 265 provides guidance on identifying and assessing risks related to accounting estimates.

.09 In auditing the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts, if the auditor has assessed management's controls over the estimation process to be effective, the auditor may determine that the most practicable and efficient approach is to test management's process. However, if the auditor finds that controls over the estimation process are ineffective, the auditor should consider whether it is practicable to take one of the following actions:

[51]Users of SOP 04-1 should consider updates to the relevant accounting and auditing standards, including AU-C 540, *Auditing Accounting Estimates and Related Disclosures*.

a. Develop an independent expectation of the estimate, or portions of it, to corroborate the reasonableness of the estimate.

b. Obtain competent evidence from outside the audited entity's process that would be sufficient to support the assertions in the Statement of Social Insurance and the related changes in the Statement of Changes in Social Insurance Amounts.

If it is not practicable to mitigate the effects of the ineffective controls through substantive procedures such as these, the auditor's report on the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts should be modified (SOP 04-1, para. 9).

.10 The auditor's objective when auditing the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts is to obtain sufficient, competent evidential matter to provide reasonable assurance that

a. the estimates presented in both statements are reasonable in the circumstances and

b. the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts are presented fairly, in all material respects, in conformity with U.S. GAAP, including adequate disclosure.

.11 If the auditor does not possess the level of competence in actuarial science to qualify as an actuary, the auditor generally should obtain the services of an independent actuary to assist the auditor in planning and performing auditing procedures.[52] Generally, the auditor will need the assistance of an independent actuary in performing various procedures during all phases of the audit and related to all elements of the estimates.[53]

Key Implementation Issues

Determining Materiality

.12 As discussed in FAM 230, materiality is one of the factors the auditor uses to determine the nature, timing, and extent of procedures. Misstatements, including omissions, are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.[54] Materiality has both quantitative and qualitative aspects. Certain misstatements or omissions, even

[52]The actuary can either be under contract with the independent auditor or employed by the independent audit organization. In either case, the actuary performing services for the auditor would need to meet the independence standards of GAGAS, which are applicable to audits of Statements of Social Insurance and Statements of Changes in Social Insurance Amounts.

[53]American Institute of Certified Public Accountants, *Auditing the Statement of Social Insurance*, SOP 04-1 (Nov. 22, 2004), para. 10, and AU-C 620, *Using the Work of an Auditor's Specialist (*effective for audits of financial statements for periods ending on or after December 15, 2012).

[54]FASAB's Statement of Federal Financial Accounting Concepts (SFFAC) 1, *Objectives of Federal Financial Reporting*, provides a slightly different definition of materiality. Since SFFACs are nonauthoritative, and in SFFAC 1, the board recognizes differences from the audit definition, the FAM is based on the definition provided in AU-C 320, *Materiality in Planning and Performing an Audit*.

though quantitatively immaterial, could have a material impact on or warrant disclosure in the financial statements for qualitative reasons.

.13 When establishing the overall audit strategy, the auditor should determine materiality for the financial statements as a whole. The auditor should determine materiality in relation to the element of the financial statements that the auditor judges is most significant to the primary users of the statements (the materiality benchmark—see FAM 230). Auditors should use professional judgment and exercise due professional care when setting the materiality benchmark, carefully assessing the information gained from risk assessment procedures and the needs of users of the financial statements (SOP 04-1, para. 22).

The auditor generally uses preliminary information to estimate the materiality benchmark. This may be prior years' audited financial statements or current-year unaudited and unadjusted interim information. To provide reasonable assurance that sufficient audit procedures are performed, the auditor may estimate the materiality benchmark at the low end of the possible materiality benchmark.

For certain federal entities, amounts reported in the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts may vary significantly from the amounts reported in the other financial statements or may differ significantly on a qualitative basis. In such cases, it may not be appropriate to establish a single materiality threshold for the entire set of financial statements. Instead, the auditor should use a separate materiality level when planning and performing the audit of the Statement of Social Insurance, the Statement of Changes in Social Insurance Amounts, and related note disclosures (SOP 04-1, para. 23).

.14 SFFAS 17 includes a discussion of SFFAC No. 1, *Objectives of Federal Financial Reporting*, which established four major reporting objectives in applying accounting standards:

1. budgetary integrity,
2. operating performance,
3. stewardship, and
4. systems and controls.

SFFAC No. 1 provides useful information to assist the auditor in determining an appropriate materiality benchmark. For example, while all four of the objectives are important, SFFAS 17 states that objectives 2 and 3 directly impact the social insurance standards.

.15 Objective No. 2 of SFFAC No. 1 states that federal financial reporting should assist report users to evaluate

- service efforts, costs, and accomplishments of the reporting entity,
- the manner in which these efforts and accomplishments have been financed, and
- the management of the entity's assets and liabilities.

SFFAS 17 indicates that information about social insurance that is relevant to this objective includes the cost of the program as well as long-range estimates (and ranges of estimates) of future costs and other obligations. Estimates of future

costs highlight the cost impact of changes in benefit levels as well as changes in economic and demographic conditions, such as the cost of health care and life expectancies.

.16 The third objective of SFFAC No. 1 states that federal financial reporting should assist report users in assessing the impact on the country of the government's operations and investments for the period and how, as a result, the government's and the nation's financial condition has changed and may change in the future. Thus, federal financial reporting should provide information that helps the reader to determine whether

- the government's financial position has improved or deteriorated over the period,
- future budgetary resources will likely be sufficient to sustain public services and to meet obligations as they come due, and
- government operations have contributed to the nation's current and future well-being.

.17 Fundamental questions about social insurance programs that can be addressed by accounting standards include whether

- programs are sustainable as currently constructed,
- the government's financial condition has improved or deteriorated as a result of its efforts to provide for these and other programs, and
- the likelihood that these programs will be able to provide benefits at current levels to those who are planning on receiving them.

The information required by this standard, taken as a whole, will help users make this assessment while acknowledging the complexity of the programs and the uncertainty of long-term projections.

.18 In determining the materiality benchmark for planning and performing audits of an entity's Statement of Social Insurance and related Statement of Changes in Social Insurance Amounts, the auditor should evaluate the actuarial present value of the estimated future

- income/revenue (excluding interest[55]) received from or on behalf of all current and future participants (estimated future revenue),
- expenditures for or on behalf of all current and future participants (estimated future expenditures), and
- balance of estimated future income/revenue (excluding interest) over/(under) estimated future expenditures (actuarial balance).

.19 The auditor may determine that the actuarial balance is the most significant element of the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts to users of the financial statements. If so, the materiality benchmark would be the actuarial balance. However, the auditor

[55]Income/revenue (excluding interest) includes payroll taxes from employers, employees, and self-employed persons; revenue from federal income taxation of scheduled OASDI benefits; and miscellaneous reimbursements from the General Fund.

may determine that it is more appropriate to select a materiality benchmark of either the estimated future incomes/revenues or the estimated future expenditures.

The auditor's basis for the selection of the materiality benchmark(s) generally should be documented, including consideration given to other possible measures or separate benchmarks for estimated future income/revenue and estimated future expenditures. Auditors generally should follow the guidance in FAM 230 in determining materiality for planning and performing audits of entity Statements of Social Insurance and the related Statements of Changes in Social Insurance Amounts.

Obtaining Management's Representations

.20 Entity management is responsible for preparing the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts and underlying estimates and changes in conformity with U.S. GAAP. Management is also responsible for the accuracy and completeness of the Statement of Social Insurance (SOP 04-1, para. 5) and the Statement of Changes in Social Insurance Amounts. Therefore, management should determine a reasonable estimate of the economic and demographic conditions that will exist in the future.[56] Because estimates in the Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts are based on subjective as well as objective factors, management should use judgment to estimate amounts included in these statements. Management's judgment may be based on its knowledge and experience about past and current events and its assumptions about conditions it expects to exist.

.21 Consistent with FAM 1001, the auditor should obtain specific representations relating to the Statement of Social Insurance and to the related Statement of Changes in Social Insurance Amounts. For an audit of an entity's Statement of Social Insurance and the related Statement of Changes in Social Insurance Amounts, the representation letter should include, as applicable, representations included in FAM 1001 A, the example management representation letter.

Auditor's Report

.22 AU-C 700, *Forming an Opinion and Reporting on Financial Statements*, addresses the auditor's responsibility to form an opinion on the financial statements. It also addresses the form and content of the auditor's report issued as a result of an audit of financial statements. AU-C 9700, *Forming an Opinion and Reporting on Financial Statements: Auditing Interpretations of AU-C Section*

[56]Para. 25 of SFFAS 17, *Accounting for Social Insurance*, states, in part, "The projections and estimates used should be based on the entity's best estimates of demographic and economic assumptions, taking each factor individually and incorporating future changes mandated by current law." Certain entities prepare social insurance information using assumptions that a board of trustees prepares. Auditors should consider such assumptions to represent "reasonable estimates" if the trustees have characterized them as such and entity management has determined them to be reasonable. With respect to these assumptions, the auditor should perform audit procedures that are consistent with the guidance in paras. 9 through 37 of SOP 04-1.

700, provides an illustration of an auditor's report containing an opinion on component financial statements that include sustainability financial statements.[57]

[57]The sustainability financial statements do not articulate with the consolidated accrual-based financial statements. For that reason, the opinion on the sustainability financial statements ordinarily will not affect the opinion on the consolidated accrual-based financial statements.

SECTION 1000

Reporting Implementation Guidance

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1001 – Management Representations

.01 This section addresses the auditor's responsibility for obtaining management representations as part of the audit, as described in AU-C 580, *Written Representations*; AU-C 940, *An Audit of Internal Control Over Financial Reporting That Is Integrated With an Audit of Financial Statements*; Office of Management and Budget (OMB) audit guidance; FAM 280; and FAM 550. It covers representations about

- financial statements;
- internal control over financial reporting;
- fraud;
- whether CFO Act agencies' financial management systems comply substantially with the three requirements of FFMIA;
- compliance with applicable laws, regulations, contracts, and grant agreements;
- social insurance; and
- budgetary and fund restrictions.

.02 Written representations from management ordinarily confirm oral representations given to the auditor, indicate and document the continuing appropriateness of those representations, and reduce the possibility of misunderstanding. Management representations are not a substitute for obtaining other audit evidence.

.03 If the auditor has doubts about the reliability of written representations provided (e.g., other audit evidence contradicts a representation) or if requested written representations were not provided, the auditor should follow the requirements discussed in FAM 550.11 through .14 to determine the effect that this may have on the reliability of audit evidence and whether this may indicate a scope limitation sufficient to preclude an unmodified opinion. See FAM 580 for reporting guidance.

.04 The specific representations obtained will depend on the circumstances of the engagement and the nature and basis of presentation of the financial statements. These representations apply to all the financial statements and all periods covered by the audit report. In addition to the representations in the AICPA standards, the auditor should determine the need to obtain representations on other matters based on the circumstances of the audited entity.

.05 FAM 1001 A provides an example representation letter for comparative financial statements. The auditor should customize the example representation letter to the circumstances of the entity being audited. Many example representations may need to be qualified, especially in an initial audit or in later audits where significant problems remain. For instance, the entity may need to add "except as follows:" at the end of a representation and describe the exceptions. The auditor should also determine the need to include additional representations and should not include any representations listed in the example representation letter that do not apply to the entity.

.06 The auditor should obtain the management representation letter from the highest level of the audited entity. The auditor should decide who to ask to sign the management representation letter. Signers should be officials who, in the auditor's view, are knowledgeable about, and responsible for, either directly or through others, the matters in the representation letter. These officials typically would be the head of the entity and the CFO or equivalent. The auditor should obtain separate management representation letters from any component units for which the auditor will issue separate reports.

.07 The auditor should ask management to prepare the representation letter on the audited entity's letterhead addressed to the auditor (AU-C 580.21). The auditor should ensure that the representations are for all financial statements and the period(s) referred to in the auditor's report (AU-C 580.20). The date of the written representations should be as of the date of the auditor's report (AU-C 580.20). The audit is complete when the auditor has enough evidence and has applied enough quality controls (including supervisory, first partner, and second partner review) to be ready to sign the audit report. To be sure that the letter is ready on time, the auditor generally should provide a draft letter to management early in the audit and update it for circumstances found throughout the audit.

.08 Especially for large, audited entities, management, in agreement with its auditor, should specify a materiality threshold for the management representation letter, below which items would not be reported. OMB audit guidance states that the management representation letter must specify management's materiality threshold(s), if applicable, used for reporting items in the letter and that representations pertaining to potential violations of the Antideficiency Act are limited to those that, if true, could have a material effect on the financial statements. It also notes that management and the auditor should reach an understanding on a materiality level. If no threshold is stated, management should note all exceptions in the representation letter.

The auditor should be satisfied that such a materiality threshold is so far below performance materiality that even many items below this level would not, in the aggregate, approach performance materiality. For example, a threshold that is 5 percent (or less) of performance materiality may be sufficiently low. The materiality level may be different for different representations and would not apply to those representations not directly related to amounts in the financial statements (such as the representation about responsibility for the statements).

Written Representations on Management's Responsibilities

.09 FAM 1001 A (which incorporates AU-C 580.A34) lists management representations that the auditor should obtain in a GAGAS audit, if applicable. These generally relate to management acknowledging its responsibility for the financial statements and its belief that the financial statements are fairly presented in conformity with U.S. generally accepted accounting principles (U.S. GAAP), and financial information is complete with appropriate recognition, measurement, and disclosure.

The following paragraphs provide a description of required representations, which are incorporated in the example representation letter at FAM 1001 A.

Representations Relating to Preparation and Presentation of the Financial Statements, Required Supplementary Information, and Other Information

.10 Management's representations should acknowledge management's responsibilities for the following, as applicable:

a. preparation and fair presentation of the financial statements in accordance with the applicable financial reporting framework (generally U.S. GAAP) (AU-C 580.10a);

b. preparation, presentation, and measurement of required supplementary information (AU-C 730.05c); and

c. preparation and presentation of other information included in the entity's annual report.

Common presentation and disclosure items are items 1 through 17. If the auditor is engaged to report on whether supplementary information is fairly stated, in all material respects, in relation to the financial statements as a whole, the auditor should obtain management's representation acknowledging its responsibility for supplementary information as required by AU-C 725, *Supplementary Information in Relation to the Financial Statements as a Whole*, and OMB audit guidance.

Representations Relating to Information Provided and Completeness of Transactions

.11 Management's representations should acknowledge that

a. management has provided the auditor with all relevant information and access, as agreed upon in the terms of the audit engagement, and

b. all transactions have been recorded and are reflected in the financial statements (AU-C 580.11).

See example items 5 and 7.

Representations Relating to Internal Control

.12 Internal control representations are found in AU-C 580.10b and 940.57. These representations relate to management

a. acknowledging its responsibility for designing, implementing, and maintaining effective internal control over financial reporting relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error (item 19);

b. stating that management has performed an assessment of the effectiveness of the entity's internal control over financial reporting and specifying the control criteria (item 21) (optional if the auditor is not opining on internal control);

c. stating that management did not use the auditor's procedures performed during the integrated audit as part of the basis for its assessment (item 23) (not applicable if the auditor is not opining on internal control);

d. stating its assessment about the effectiveness of the entity's internal control over financial reporting based on the criteria as of a specified date (item 24) (optional if the auditor is not opining on internal control);

e. stating that management has disclosed to the auditor all deficiencies in the design or operation of internal control over financial reporting, including separately disclosing to the auditor all such deficiencies that it believes to be significant deficiencies or material weaknesses in internal control over financial reporting (item 25) (optional if the auditor is not opining on internal control);

f. stating whether the significant deficiencies and material weaknesses identified and communicated to management and those charged with governance during previous engagements have been resolved and specifically identifying any that have not (item 27); and

g. stating whether there were, subsequent to the date being reported on, any changes in internal control over financial reporting or other conditions that might significantly affect internal control over financial reporting, including any corrective actions taken by management with regard to significant deficiencies and material weaknesses (item 29).

.13 For bullets (b) and (d) in the paragraph above, entities may use criteria established under FMFIA, including OMB Circular No. A-123, in their FMFIA internal control assessments. GAO's *Standards for Internal Control in the Federal Government* (known as the Green Book) were established as standards for federal entities to follow.[1] These standards incorporate concepts and principles from the private sector guidance *Internal Control—Integrated Framework* issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). Entities should summarize in their representation letters any material weaknesses relating to financial reporting (including safeguarding) and compliance (including budget).

Example wording for the representations, where management asserts the effectiveness of internal control over financial reporting, is provided in FAM 1001 A (item 24). If there are material weaknesses, management should include a brief description of them in its representation letter and modify its assessment accordingly.

Representations Relating to Fraud

.14 Internal control over financial reporting representations related to fraud can be found in AU-C 580 and AU-C 940. These representations, examples of which are provided in FAM 1001 A (items 30 through 36), relate to management

a. acknowledging its responsibility for the design, implementation, and maintenance of internal controls to prevent and detect fraud (AU-C 580.12a);

b. disclosing the results of its assessment of the risk that the financial statements may be materially misstated as a result of fraud (AU-C 580.12b);

c. disclosing knowledge of fraud or suspected fraud that affects the entity and involves (1) management, (2) employees who have significant roles in internal control over financial reporting, or (3) others when the fraud could have a material effect on the financial statements (AU-C 580.12c and AU-C 940.57f); and

[1]GAO, *Standards for Internal Control in the Federal Government,* GAO-25-107721 (Washington, D.C.: May 2025).

d. disclosing knowledge of any allegations of fraud or suspected fraud affecting the entity's financial statements received in communications from employees, former employees, analysts, regulators, or others (AU-C 580.12d).

Representations Relating to Applicable Laws, Regulations, Contracts, and Grant Agreements

.15 Management's representations should include that all instances of identified or suspected noncompliance with laws, regulations, contracts, and grant agreements applicable to the entity whose effects should be considered when preparing the financial statements have been disclosed to the auditor (items 40 through 43) (AU-C 580.13).

Representations Relating to Uncorrected Misstatements

.16 Management's representations should acknowledge whether it believes that the effects of uncorrected misstatements are immaterial, individually and in the aggregate, to the financial statements as a whole (item 8) (AU-C 580.14).

.17 The effect of any uncorrected financial statement misstatements (other than clearly trivial) per FAM 540 should be included in a summary of uncorrected misstatements and attached to the representation letter (AU-C 580.14). See example I, tables II and III, in FAM 595 C.

Representations Relating to Litigation and Claims

.18 Management's representations should acknowledge that all known actual or possible litigation and claims whose effects should be considered by management when preparing the financial statements have been disclosed to the auditor and accounted for and disclosed in accordance with the applicable financial reporting framework (generally U.S. GAAP) (items 14 and 15) (AU-C 580.15).

Representations Relating to Estimates

.19 Management's representations should acknowledge whether the methods, significant assumptions, and data used in making the accounting estimates and the related note disclosures are appropriate to achieve recognition, measurement, or disclosure that is in accordance with the applicable financial reporting framework (generally U.S. GAAP). The auditor should also consider the need to obtain representations about specific accounting estimates, including in relation to the methods, assumptions, or data used (item 4) (AU-C 580.16). See AU-C 580.A13 for example representations about specific accounting estimates.

Representations Relating to Disclosure Entities, Related-Parties, and Public-Private Partnerships

.20 Management's representations should acknowledge that it has disclosed to the auditor the identities of all the entity's disclosure entities, related parties, and public-private partnerships, and all the relationships and transactions related to them, and it has appropriately accounted for and disclosed such relationships and transactions in the financial statements (items 11 and 12) (AU-C 580.17). For entities issuing financial statements in accordance with Financial Accounting Standards Board (FASB) accounting standards, this representation does not include disclosure entities and public-private partnerships.

Representations Relating to Subsequent Events

.21 Management's representations should acknowledge that all events occurring subsequent to the date of the financial statements and for which the applicable financial reporting framework (generally U.S. GAAP) requires adjustment or disclosure have been adjusted or disclosed (item 16) (AU-C 580.18).

Additional Written Representations on the Financial Statements

.22 In addition to the AU-C sections referenced in the Written Representations on Management's Responsibilities subsection above, other AU-C sections require the auditor to request written representations (AU-C 580.19). For example, AU-C sections 560, 570, 700, and 720 specify additional representations that are required in certain circumstances. Additionally, if the auditor determines that it is necessary to obtain one or more written representations to support other audit evidence relevant to the financial statements or one or more specific assertions in the financial statements, the auditor should request such other written representations (AU-C 580.19). This is important when the corroborating information that can be obtained by procedures other than inquiry is limited. Examples of additional representations that may be appropriate depending on an entity's operations are provided in AU-C 580.A17 through .A20 and .A35 and in the paragraphs below.

.23 Single-year presentation – If the entity prepares single-year financial statements, the auditor should obtain additional representations from management stating that

a. there are no misstatements in the prior-year financial statements that were discovered subsequent to the issuance of such financial statements or

b. management has identified and disclosed to the auditor misstatements in the prior-year financial statements that were discovered subsequent to the issuance of such financial statements and that the effects of uncorrected misstatements in the prior-year financial statements, including subsequently discovered misstatements, are material/immaterial to the prior-year financial statements as a whole.

.24 Intragovernmental Activities – OMB audit guidance has emphasized the importance of identifying and eliminating intragovernmental transactions and resolving intragovernmental differences for federal entities and their components (item 18).

.25 Financial management systems' substantial compliance with the three requirements of FFMIA – FFMIA requires an auditor auditing the financial statements of a CFO Act agency to report whether the agency's financial management systems comply substantially with (1) federal financial management systems requirements, (2) applicable federal accounting standards (U.S. GAAP), and (3) the *U.S. Standard General Ledger* (USSGL) at the transaction level. To report in accordance with FFMIA, the auditor should obtain representations from management as to whether the agency's financial management systems comply substantially with these requirements.

.26 The auditor should obtain representations that management is responsible for having its systems comply substantially with the FFMIA requirements, stating that it has assessed the systems' compliance, stating the criteria used, and asserting whether the systems comply substantially with FFMIA requirements (items 37-

39). The criteria are the requirements in OMB Circular No. A-123, appendix D, *Management of Financial Management Systems – Risk and Compliance*. The federal financial management systems requirements are further described, including authoritative references, in the *Treasury Financial Manual*, volume 1, part 6, chapter 9500, *Revised Federal Financial Management System Requirements*.

.27 Statement of Social Insurance and Changes in Social Insurance Amounts – FASAB standards require a *Statement of Social Insurance* for certain entities. See AICPA publication SOP 04-1, *Auditing the Statement of Social Insurance* (AU-C 580.19; SOP 04-1 § 36) (items 44-52).

.28 Budgetary Funds – OMB audit guidance includes a representation by management on the consistency of budgetary data (item 53).

.29 Restricted Funds – All material funds from dedicated collections, as defined by Statement of Federal Financial Accounting Standards (SFFAS) 43, *Funds from Dedicated Collections: Amending Statement of Federal Financial Accounting Standards 27, Identifying and Reporting Earmarked Funds*, and all other material restricted funds (e.g., restricted cash), are to be presented and/or disclosed in the financial statements (item 54).

.30 Service Organizations – OMB audit guidance includes representations by management on its knowledge of (1) any fraud, non-compliance, or uncorrected misstatements reported by, or related to, service organizations, and (2) any changes in internal controls at service organizations subsequent to the effective dates of the service organizations' report(s) (items 55–56).

Effect of Change in Management on Representation Letter

.31 Sometimes management is reluctant to sign representations for periods when it did not manage the entity. The auditor may explain to management that by issuing the financial statements, it is making the assertions implicit in the financial statements. Additionally, the auditor may discuss the following with management in order to obtain representations when a change in management occurs:

a. Auditing standards require management representations covering all financial statements presented.

b. In the engagement letter (FAM 215), entity management indicated that it would provide certain representations covering all financial statements presented.

c. New executives may consult with prior management and appropriate staff members who were present during the period audited to determine whether the representations that officials will sign are complete and accurate.

d. Representations are made to the best of the signer's knowledge and belief.

e. Not signing will result in a scope limitation and disclaimer of the auditor's opinion.

1001 A – Example Management Representation Letter

[Entity Letterhead]

[Date of Auditor's Report and Completion of the Audit]

[Name and Title of Audit Organization Head]
[Address of Audit Organization]

Dear **[Name of Audit Organization Head]**:

We are providing this letter in connection with your integrated **[if expressing an opinion on the effectiveness of internal control over financial reporting]** audits of the balance sheets of **[name of entity]** as of September 30, 20X2, and 20X1,[2] and the related statements of net costs, changes in net position, budgetary resources, and custodial activity **[if custodial activity is reported]** for the years then ended, and **[if social insurance is reported]** the **[years presented]** statements of social insurance (SOSI) and the statements of changes in social insurance amounts (SCSIA) for the years ended **[dates presented]**, and the related notes to the financial statements, hereinafter referred to as the financial statements.

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

Except where otherwise stated below, immaterial matters less than $**[Insert amount]** collectively are not considered to be exceptions that require disclosure for the purpose of the following representations. This amount is not necessarily indicative of amounts that would require adjustment to or disclosure in the financial statements. Such quantitative materiality considerations do not apply to representations that are not directly related to amounts included in the financial statements, required supplementary information (RSI) **[if RSI is presented]**[3] and other information **[if other information is presented]**.[4]

We confirm, as of **[date of auditor's report]**, the following representations made to you during your audits. These representations pertain to both years' financial statements and update the representations we provided in the prior year.

Financial Statements, RSI, and Other Information

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated **[insert date of engagement letter]**, for the preparation and fair presentation of the financial statements, including related notes, in accordance with U.S. generally accepted accounting principles (U.S. GAAP), issued by **[name of standard setter, such as Federal Accounting Standards Advisory Board or Financial Accounting Standards Board]**. The financial statements are fairly presented in accordance with U.S. GAAP. **[If there are departures from generally accepted accounting principles, this statement should be modified to disclose all known instances of material departure.]**

[2]Note to auditor: 20X2 denotes the current year, and 20X1 denotes the prior year.

[3]RSI consists of **[insert description]**.

[4]Other information consists of **[insert description]**.

2. **[If RSI is presented]** We have fulfilled our responsibilities for the measurement, preparation, and presentation of the RSI in accordance with prescribed guidelines established in U.S. GAAP.

   a. The RSI is measured and presented in accordance with prescribed guidelines in U.S. GAAP, is consistent with the financial statements, and contains no material misstatement of fact.

   b. There are no changes in the methods of measurement or presentation of the RSI from the prior year that have not been disclosed to you, including the reasons for such changes. **[If there were no such changes, the underlined text should be omitted.]**

   c. There are no significant assumptions or interpretations underlying the measurement or presentation of the RSI that have not been disclosed to you. **[If there are no assumptions or interpretations, the underlined text should be omitted.]**

3. **[If other information is presented]** We have fulfilled our responsibilities for the preparation and presentation of the other information (OI) included in **[entity's] [insert name of annual report, e.g., agency financial report]** and for ensuring the consistency of that information with the audited financial statements and RSI.

   a. The OI included in **[entity's] [insert name of annual report, e.g., agency financial report]** is consistent with the financial statements and RSI and contains no material misstatement of fact.

   b. There are no changes in the methods of measurement or presentation of the OI from the prior year that have not been disclosed to you, including the reasons for such changes. **[If there were no such changes, the underlined text should be omitted.]**

   c. There are no significant assumptions or interpretations underlying the measurement or presentation of the OI that have not been disclosed to you. **[If there are no assumptions or interpretations, the underlined text should be omitted.]**

4. The methods, data, and significant assumptions that we used in making accounting estimates and their related note disclosures are appropriate to achieve recognition, measurement, or disclosure that is reasonable in the context of U.S. GAAP.

5. We have provided you with all relevant information and access, as agreed upon in the terms of the audit engagement letter, including the following:

   a. access to all information that is relevant to the preparation and fair presentation of the financial statements, such as records, documentation, and other matters;

   b. additional information that you have requested from us for the purpose of the audit, including

      i. minutes of meetings, or summaries of actions of recent meetings for which minutes have not been prepared, of the **[Board of Directors or other similar bodies of those charged with governance]** and

      ii. any communications from the Office of Management and Budget (OMB) or the Department of the Treasury's Bureau of the Fiscal Service concerning noncompliance with, or deficiencies in, financial reporting practices;

   c. unrestricted access to and full cooperation of personnel within the entity from whom you determined it necessary to obtain audit evidence; and

   d. all reports obtained from **[Entity's]** service organizations.

6. Except as disclosed to you in writing, there have been none of the following:

a. Circumstances that have resulted in communications from **[Entity's]** legal counsel reporting evidence of a material violation of law or breach of fiduciary duty, or similar violations by **[Entity]** or any agent thereof.

b. Communications from regulatory or oversight agencies (such as OMB and GAO), other government entities or agencies, governmental representatives, employees, or others concerning investigations or allegations of noncompliance with laws or regulations, deficiencies in financial reporting practices, or other matters that could have a material adverse effect on the financial statements, RSI, and OI.

7. All transactions have been recorded in the accounting records and are reflected in the financial statements.

8. There are no uncorrected misstatements in the financial statements, as we have corrected the financial statements for any misstatements you have identified during the audit and communicated to us. **OR** The effects of uncorrected misstatements in the attached summary are immaterial, both individually and in the aggregate, to the financial statements as a whole. (Note: As discussed in AU-C 580.A12, if management believes that certain of the identified items are not misstatements, management's belief may be acknowledged by adding to the representation, for example, "We believe that items XX and XX do not constitute misstatements because (description of reason).")

9. **[Entity]** has satisfactory title to all owned assets, including stewardship land and heritage assets. There are no liens or encumbrances on these assets, and no assets have been pledged. **OR [Entity]** has satisfactory title to all owned assets. There are no liens or encumbrances on these assets, and no assets have been pledged. **[Entity]** has no stewardship land or heritage assets.

10. We have no plans or intentions that may materially affect the recognition, measurement, presentation, disclosure, or classification of assets and liabilities.

11. We have disclosed to you the identities of all **[Entity's]** disclosure entities, related parties, and public-private partnerships, and all the relationships and transactions related to them.

12. All relationships and transactions with disclosure entities, related parties, and public-private partnerships have been appropriately accounted for and disclosed in the financial statements in accordance with U.S. GAAP and do not prevent the financial statements from achieving fair presentation.

13. Guarantees under which **[Entity]** is contingently liable have been properly reported or disclosed. **OR** There are no guarantees under which **[Entity]** is contingently liable that require reporting or disclosure in the financial statements.

14. We have disclosed to you all known actual or possible litigation, claims, and assessments, including those related to treaties and other international agreements, whose effects should be considered when preparing the financial statements. **OR** We are not aware of any pending or threatened litigation and claims whose effects should be considered when preparing the financial statements.

15. The effects of all known actual or possible litigation, claims, and assessments, including those related to treaties and other international agreements, have been accounted for and disclosed in the financial statements in accordance with U.S. GAAP.

16. All events or transactions subsequent to September 30, 20X2, and for which U.S. GAAP requires adjustment or disclosure have been adjusted or disclosed in the financial statements.

17. We have properly recorded or disclosed in the financial statements changes in accounting principle that affect the consistency of the financial statements between the periods presented. **OR** There are no changes in accounting principle that affect the consistency of the financial statements between the periods presented.

Intragovernmental Activities

18. All intra-entity transactions and balances have been appropriately identified and eliminated for financial reporting purposes **[if no intra-entity transactions or balances, replace with "There are no intra-entity transactions or balances"]**. All intragovernmental transactions and activities have been appropriately identified, recorded, and disclosed in the financial statements. There are no **[OR "There are"]** material unresolved differences in intragovernmental transactions and balances with Federal entity trading partners, and appropriate adjustments have been made to address reconciling items.

Internal Control

19. We acknowledge our responsibility for designing, implementing, and maintaining effective internal control over financial reporting relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

20. We have fulfilled our responsibility for designing, implementing, and maintaining effective internal control over financial reporting relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

21. We are responsible for assessing the effectiveness of internal control over financial reporting based on the criteria established under 31 U.S.C. § 3512 (c), (d) (commonly known as the Federal Managers' Financial Integrity Act of 1982 (FMFIA)) **[or other appropriate criteria]**, providing our assessment about the effectiveness of internal control over financial reporting as of September 30, 20X2,[5] based on our assessment, and supporting our assessment about the effectiveness of internal control over financial reporting with sufficient evaluations and documentation.

    [This item is optional if the auditor is not opining on internal control. Also, if the entity bases its internal control assessment on suitable criteria other than 31 U.S.C. § 3512(c), (d), cite the criteria used (for example, *Internal Control—Integrated Framework* issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO)).]

22. We assessed the effectiveness of **[Entity's]** internal control over financial reporting as of September 30, 20X2, based on the criteria established under FMFIA. **[Entity's]** internal control over financial reporting is a process effected by those charged with governance, management, and other personnel, the objectives of which are to provide reasonable assurance that (1) transactions are properly recorded, processed, and summarized to permit the preparation of financial statements in accordance with U.S. GAAP, and assets are safeguarded against loss from unauthorized acquisition, use, or disposition, and (2) transactions are executed in accordance with provisions of applicable laws, including those governing the use of budget authority; regulations; contracts; and grant agreements, noncompliance with which could have a material effect on the financial statements.

[5]If the auditor is opining on internal control, the date of management's report on internal control must be the date of the opinion. However, management may choose to include this representation even if the auditor is not opining on internal control. If that occurs, the date must be the date of management's assurance statement in accordance with OMB Circular No. A-123.

[This item is optional if the auditor is not opining on internal control. Also, if the entity bases its internal control assessment on suitable criteria other than 31 U.S.C. § 3512(c), (d), cite the criteria used (for example, COSO's *Internal Control—Integrated Framework*).]

23. We did not use **[auditor's]** audit procedures performed during the integrated audits of **[Entity's]** 20X2 and 20X1 financial statements as part of the basis for our assessment about **[Entity's]** internal control over financial reporting as of September 30, 20X2. **[Delete this item if the auditor is not opining on internal control.]**

24. Based on the assessment in number 22, we conclude that as of September 30, 20X2, **[Entity's]** internal control over financial reporting was effective. **[This item is optional if the auditor is not opining on internal control.]**

    If there are material weaknesses: Based on the assessment in number 22, we conclude that as of September 30, 20X2, **[Entity's]** internal control over financial reporting was not effective because of the effects of the material weaknesses discussed below **[or in an attachment]**.

25. We have disclosed to you all **[OR "There are no"]** deficiencies in the design or operation of internal control over financial reporting as of September 30, 20X2, and we have separately disclosed all such deficiencies that we believe to be significant deficiencies or material weaknesses. **[This item is optional if the auditor is not opining on internal control.]**

26. We have disclosed to you all significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting that existed at any time during the years ended September 30, 20X2, and September 30, 20X1, and indicated which deficiencies were corrected by September 30, 20X2.

27. All significant deficiencies and material weaknesses identified and communicated to us by **[auditor]** in prior years' audits that remained unresolved as of September 30, 20X1, have been resolved **OR [indicate specifically any that have not been resolved]** as of September 30, 20X2.

    If there were no significant deficiencies or material weaknesses: During the audit of the financial statements for the year ended September 30, 20X1, **[auditor]** did not communicate any significant deficiencies or material weaknesses to us.

28. We have identified to you all previous audits, attestation engagements, and other studies that relate to the objectives of this audit, including whether related recommendations have been implemented.

29. There have been no changes to internal control over financial reporting subsequent to September 30, 20X2, or other conditions that might significantly affect internal control over financial reporting. **[If there were changes, describe them, including any corrective actions taken with regard to any significant deficiencies or material weaknesses.]**

Fraud

30. We acknowledge our responsibility for designing, implementing, and maintaining effective internal control to prevent and detect fraud.

31. We have fulfilled our responsibility for designing, implementing, and maintaining effective internal control to prevent or detect fraud.

32. We have **[no knowledge of any] OR [disclosed to you all information that we are aware of regarding]** fraud or suspected fraud that affects the entity and involves (1) management, (2) employees who have significant roles in internal control over financial reporting, or (3) others when the fraud could have a material effect on the financial statements. **[If there is**

knowledge of any instances, including those that do not result in a material misstatement to the financial statements, describe them.]

33. We have **[no knowledge of any] OR [disclosed to you all information that we are aware of regarding]** fraud or suspected fraud that resulted in a material misstatement to **[Entity's]** financial statements or RSI.

34. We have **[no knowledge of any] OR [disclosed to you all information that we are aware of regarding]** allegations of fraud or suspected fraud affecting the financial statements communicated by employees, former employees, or others.

35. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.

36. We have no knowledge of any officer of **[Entity]**, or any other person acting under the direction thereof, having taken any action to fraudulently influence, coerce, manipulate, or mislead you during your audit.

Compliance of Systems with FFMIA

[If a CFO Act agency, which is subject to the Federal Financial Management Improvement Act of 1996 (FFMIA).]

37. We are responsible for implementing and maintaining financial management systems that comply substantially with federal financial management systems requirements, federal accounting standards (U.S. GAAP), and application of the *U.S. Standard General Ledger* (USSGL) at the transaction level.

38. We have assessed the financial management systems to determine whether they comply substantially with federal financial management systems requirements, federal accounting standards, and application of the USSGL at the transaction level. Our assessment was based on OMB guidance.

39. **[Entity's]** financial management systems complied substantially with federal financial management systems requirements, federal accounting standards, and application of the USSGL at the transaction level as of September 30, 20X2.

    [If the financial management systems comply substantially with only one or two of the above elements, modify as follows:]

    As of September 30, 20X2, **[Entity's]** financial management systems comply substantially with **[specify which of the three elements comply substantially (e.g., federal accounting standards and application of the USSGL at the transaction level)]**, but did not comply substantially with **[specify which of the three elements do not comply substantially (e.g., federal financial management systems requirements)]**, as described below **[or in an attachment]**.

    [If the financial management systems do not comply substantially with any of these three elements, use the following paragraph:]

    As of September 30, 20X2, **[Entity's]** financial management systems do not comply substantially with the federal financial management systems requirements, applicable federal accounting standards, and application of the USSGL at the transaction level.

    [If the financial management systems do not comply substantially with one or more of the three elements, the representation should (1) identify the entity or organization responsible for the financial management systems that were found to not comply substantially with any of the three elements; (2) identify all the facts pertaining to the noncompliance, including the nature and extent of the noncompliance and the

primary reason or cause of the noncompliance; and (3) indicate whether the remediation plan that includes the resources, remedies, and intermediate target dates necessary to bring the entity's financial management systems into substantial compliance has been provided to the auditor or has not been prepared.]

Compliance with Applicable Laws, Regulations, Contracts, and Grant Agreements

40. We are responsible for complying with laws, regulations, contracts, and grant agreements applicable to **[Entity]**.

41. We have identified and disclosed to you all provisions of laws, regulations, contracts, and grant agreements applicable to **[Entity]**, noncompliance with which could have a material effect on the financial statements.

42. There are no instances of noncompliance or suspected noncompliance with laws, regulations, contracts, and grant agreements applicable to **[Entity]** whose effects should be considered when preparing the financial statements. **OR** We have disclosed to you all instances of noncompliance or suspected noncompliance with laws, regulations, contracts, and grant agreements applicable to **[Entity]** whose effects should be considered when preparing financial statements.

43. We are not aware of any violations, or potential violations, of the Antideficiency Act for the years ended September 30, 20X2, and 20X1, and through the date of this letter. **OR** We have communicated to you all violations of the Antideficiency Act for the years ended September 30, 20X2, and 20X1, and through the date of this letter, and such violations have or could have a material effect on the financial statements for the years ended September 30, 20X2, and 20X1 **[except for {add list of Antideficiency Act violations that do not have a material effect on the financial statements}]**. In addition, we have communicated to you all potential violations of the Antideficiency Act for the years ended September 30, 20X2, and 20X1, and through the date of this letter that, if true, could have a material effect on the financial statements for the years ended September 30, 20X2, and 20X1.

Statement of Social Insurance and Statement of Changes in Social Insurance Amounts

[If a SOSI and an SCSIA are presented, see AICPA publication SOP 04-1, *Auditing the Statement of Social Insurance* (SOP 04-1 § 39), which suggests the following management representations.]

44. Management is responsible for the assumptions and methods used in the preparation of the SOSI and SCSIA. Management agrees with the actuarial methods and assumptions that **[Entity's]** actuary used and has no knowledge or belief that would make such methods or assumptions inappropriate in the circumstances. Management did not give any instructions, or cause any instructions to be given to **[Entity's]** actuary with respect to values or amounts derived, and is not aware of any matters that have affected the objectivity of **[Entity's]** actuary. Management believes that the actuarial assumptions and methods used to measure the amounts in the SOSI and SCSIA for financial accounting purposes are appropriate in the circumstances.

45. Actuarial assumptions and methods used to measure the amounts in the SOSI and SCSIA for financial accounting and disclosure purposes represent management's reasonable estimates regarding future events based on demographic and economic assumptions and future changes mandated by law.

46. There were no material omissions from the data provided to **[Entity's]** actuary for the purpose of determining the actuarial present value of the estimated future income to be received and estimated future expenditures to be paid during the projection period sufficient

to illustrate the long-term sustainability of **[name of the social insurance program]** as of **[dates of SOSI presented]**.

47. The SOSI covers a projection period sufficient to illustrate the long-term sustainability of the social insurance program.

48. Management provided the auditor with all the reports developed by external review groups appointed by **[Entity's or the program's trustees]** related to estimates in the SOSI.

49. The following matters relating to the SOSI have been disclosed properly in the notes to the financial statements:

    a. The accumulated excess of all past cash receipts, including interest on investments, over all past cash disbursements within the social insurance program represented by the fund balance at the valuation date.

    b. An explanation of how the net present value is calculated for the closed group.

    c. Comparative financial information for items in paragraphs 2a, 2b, 2c, and 2d (1) of SOP 04-1, for the current year and for each of the preceding 4 years. (Note any preceding years that are unaudited.)

    d. Significant assumptions used in preparing estimates.

50. There have been no changes in **[or, Changes in the following have been properly reported or disclosed in]** the actuarial methods or assumptions used to calculate amounts recorded or disclosed in the financial statements between the

    a. valuation dates of (for example, January 1, 20X2, and January 1, 20X1, and other valuation dates presented) or changes in the method of collecting data and

    b. valuation date of (for example, January 1, 20X2, and the other valuation dates presented) and the financial reporting date of (September 30, 20X2) or changes in the method of collecting data.

51. There have been no changes in [**or, Changes in the following have been properly reported or disclosed in]** laws and regulations affecting social insurance program income and benefits between the

    a. valuation dates of (for example, January 1, 20X2, and January 1, 20X1, and other valuation dates presented) and

    b. valuation date of (for example, January 1, 20X2) and the financial reporting date of (September 30, 20X2).

52. Accounting estimates applicable to the financial information of **[Entity]** included in the SOSI and SCSIA are based on management's reasonable estimate, after considering past and current events and assumptions about future events.

Budgetary and Restricted Funds

53. **[If a statement of budgetary resources is presented]** The information presented in **[Entity's]** statement of budgetary resources is reconcilable to the information submitted in its year-end Reports on Budget Execution and Budgetary Resources (SF-133). This information will be used as input for the fiscal year 20X2 actual-year column of the Program and Financing Schedules reported in the fiscal year 20X4 *Budget of the U.S. Government*. Such information is supported by the related financial records and data.

54. We have presented and disclosed in the financial statements all material dedicated collections as defined by Statement of Federal Financial Accounting Standards 43 and all

other material restricted funds **OR** There are no material dedicated collections or other material restricted funds that require presentation and disclosure in the financial statements.

Service Organizations

55. **[Entity]** does not use service organizations. **OR** Service organizations [and subservice organizations, if any] that we use have not reported to us, nor are we otherwise aware of, any (1) fraud; (2) noncompliance with applicable laws, regulations, contracts, or grant agreements; or (3) uncorrected misstatements affecting the financial statements that are attributable to such service **[or subservice, if any]** organizations.

    [If any such knowledge has been obtained, it should be described or specifically state how it was communicated to us.]

56. **[If entity uses service organizations]** Service organizations **[and subservice organizations, if any]** that we use have not reported to us, nor are we otherwise aware of, any changes in the design, implementation, or operating effectiveness of internal controls at the service organizations **[or subservice organizations, if any]** subsequent to the effective dates of the service and subservice organizations' report(s) provided to you that could (1) affect the risks of material misstatement of the financial statements or (2) result in material misstatements of the financial statements arising from processing errors that would not be prevented, or detected and corrected, on a timely basis.

    [If any such knowledge has been obtained, the letter should describe it or refer to how it was communicated to us, including the effects, if any, on the financial statements or the effectiveness of internal control over financial reporting, including specific identification of any internal control deficiencies that are considered to be material weaknesses or significant deficiencies.]

[Signed by Entity Head]

[Signed by Chief Financial Officer]

Enclosure(s)

1002 – Litigation, Claims, and Assessments

.01 FAM 1002 provides guidance for obtaining evidence that the entity's financial accounting and reporting of contingencies arising from litigation, claims, and assessments conform with U.S. GAAP.[6] This section discusses the applicable accounting and reporting guidance and audit procedures and includes the following practice aids:

- FAM 1002 A – Example Audit Procedures for Litigation, Claims, and Assessments
- FAM 1002 B – Example Legal Counsel Request
- FAM 1002 C – Example Legal Counsel Response
- FAM 1002 D – Example Management Schedule

Accounting and Reporting Guidance

.02 Entity management is responsible for implementing policies and procedures to identify, evaluate, account for, and disclose litigation, claims, and assessments as a basis for the preparation of financial statements in conformity with U.S. GAAP.

.03 SFFAS 5, *Accounting for Liabilities of the Federal Government*, as amended by SFFAS 12, *Recognition of Contingent Liabilities Arising from Litigation*, contains accounting and reporting standards for loss contingencies, including those arising from litigation, claims, and assessments.[7] Federal Accounting Standards Advisory Board (FASAB) Interpretation No. 2, *Accounting for Treasury Judgment Fund Transactions*, provides additional guidance related to claims to be paid through the Treasury Judgment Fund.[8] Statement of Financial Accounting Standards (FAS) No. 5, *Accounting for Contingencies*, also provides guidance for financial accounting and reporting for loss and gain contingencies for government corporations and for entities following U.S. GAAP for the private sector promulgated by FASB. The definition of probable for legal contingencies is essentially the same in FAS No. 5 and SFFAS 5.

.04 A contingency is an existing condition, situation, or set of circumstances involving uncertainty as to possible gain or loss to an entity. The uncertainty will ultimately be resolved when one or more future events occur or fail to occur. When a loss

[6]Reporting of contingencies includes environmental and disposal liabilities—a contingency that is often a significant issue for the federal government.

[7]SFFAS 7 has guidance for reporting claims for tax refunds. SFFAS 7 indicates that rather than recognizing probable claims and disclosing other claims in the notes to the financial statements, other claims for refunds that are probable should be included as supplementary information.

[8]A permanent, indefinite appropriation, commonly known as the Judgment Fund, is available to pay final judgments, settlement agreements, and certain types of administrative awards against the United States, and interest and costs specified in the judgments or otherwise authorized by law, when payment is not otherwise provided for. The Secretary of the Treasury certifies all payments from the fund. (See 31 U.S.C. § 1304, Judgments, awards, and compromise settlements.) FASAB Interpretation No. 2 clarifies how federal entities report the costs and liabilities arising from claims to be paid by the Judgment Fund and how the Judgment Fund accounts for the amounts that it is required to pay on behalf of federal entities.

contingency exists, the likelihood that the future event or events will confirm the loss or impairment of an asset or the incurrence of a liability can range from probable to remote. SFFAS 5 and 12 use the terms probable, reasonably possible, and remote to identify three areas within the range of probability, as follows:

- **Probable:** Generally, the future confirming event or events are more likely than not to occur. For pending or threatened litigation and unasserted claims, the future confirming event or events are likely to occur.
- **Reasonably possible**: The chance of the future event or events occurring is more than remote but less than probable.
- **Remote:** The chance of the future event or events occurring is slight.

.05 The entity should recognize a liability and a related charge to expense for an estimated loss from a loss contingency only when[9]

- a past event or exchange transaction has occurred,
- a future outflow or other sacrifice of resources is probable, and
- the future outflow or sacrifice of resources is measurable.

.06 Disclosure of the nature of an accrued liability for loss contingencies, including the amount accrued, may be necessary for the financial statements to not be misleading. For example, if the amount accrued is large or unusual, the entity should determine whether to disclose the contingency.

If no accrual is made for a loss contingency because one or more of the conditions in FAM 1002.05 are not met, and there is at least a reasonable possibility that a loss may be incurred, the entity should disclose the nature of the contingency and provide an estimate of the possible liability or range of possible liability, if estimable, or a statement that such an estimate cannot be made. The reporting of contingent losses depends on the likelihood that a future event or events will confirm the loss or impairment of an asset or the incurrence of a liability. Terms used to assess the likelihood of loss are probable, reasonably possible, and remote as discussed in FAM 1002.04.

.07 Contingent losses that are assessed as probable and measurable are accrued in the financial statements. Losses that are assessed to be at least reasonably possible are disclosed in the notes. In addition, if the Judgment Fund might be involved in the payment of the possible loss, the entity should discuss the Judgment Fund's role in a note to the financial statements.

For an overview of the standards that provide criteria for how entities are to account for contingent losses based on the likelihood of loss and measurability, see table 1002.1.

[9]If the Judgment Fund will pay the claim, the entity still recognizes the liability and cost at this time. Once the claim is settled or a court judgment is assessed and the Judgment Fund is determined to be the appropriate source for payment, the entity reduces the liability by recognizing an (imputed) financing source. Note that for Judgment Fund payments made under the Contract Disputes Act and the Notification and Federal Employee Antidiscrimination and Retaliation Act, the entity establishes a payable to reimburse the Judgment Fund.

Table 1002.1: Accounting for Contingent Losses

Likelihood of future outflow or other sacrifice of resources	Loss amount can be reasonably measured	Loss range can be reasonably measured	Loss amount or range cannot be reasonably measured
Probable: Generally, the future confirming event(s) is(are) more likely than not to occur. For pending or threatened litigation and unasserted claims, the future confirming event(s) is(are) likely to occur.	Accrue the liability. Report on Balance Sheet and Statement of Net Cost.	Accrue liability of best estimate or minimum amount in loss range if there is no best estimate, and disclose nature of contingency and range of estimated liability.	Disclose nature of contingency and include a statement that an estimate cannot be made.
Reasonably possible:[10] Possibility of future confirming event(s) occurring is more than remote and less than likely.	Disclose nature of contingency and estimated amount.	Disclose nature of contingency and estimated loss range.	Disclose nature of contingency and include a statement that an estimate cannot be made.
Remote: Possibility of future event(s) occurring is slight.	No action is required.	No action is required.	No action is required.

.08 Although management often relies on the advice of legal counsel about the (a) likelihood of an unfavorable outcome and (b) estimates of the amount or range of potential loss for litigation, claims, and assessments, management is ultimately responsible for determining whether these contingencies are probable, reasonably possible, or remote. Management does this to decide whether these contingencies should be recognized as liabilities, disclosed in the notes to the financial statements, or both. Thus, OMB audit guidance requires entity management to (a) document in a schedule how the information contained in the legal counsel response was considered in preparing the financial statements and (b) provide this schedule to the auditor as soon as practical after the legal counsel response is provided to the auditor. An example management schedule is provided at FAM 1002 D.

[10]The financial reporting treatment for cases where the likelihood of future outflow or other sacrifice of resources is assessed as “unable to determine” should be consistent with the disclosure requirements for reasonably possible cases. Per the *Treasury Financial Manual*, entities significant to the consolidated financial statements of the U.S. government should avoid excessive use (and misuse) of the "unable to determine" assessment. This likelihood should only be used to categorize cases for which the general counsel is unable to express an opinion because of inherent uncertainties.

Audit Procedures

.09 As discussed in FAM 280.03, the auditor should design and perform audit procedures to identify litigation, claims, and assessments involving the entity that may give rise to a risk of material misstatement. Such procedures include making inquiries of management, which may involve a discussion about their policies and procedures for identifying, evaluating, and accounting for litigation, claims, and assessments. The auditor should also design procedures to test the entity's accounting for and disclosure of litigation, claims, and assessments. See example audit procedures and other practice aids at FAM 1002 A, FAM 1002 B, and FAM 1002 C, which incorporate the applicable AU-C audit requirements. OMB audit guidance also provides procedures related to litigation, claims, and assessments.

.10 Based on AU-C 501.18, for actual or potential litigation, claims, and assessments identified in performing the required audit procedures discussed in FAM 280.03, the auditor should obtain audit evidence relevant to the following factors:

a. the period in which the underlying cause for legal action occurred;

b. the likelihood of an unfavorable outcome (probable, reasonably possible, or remote); and

c. the amount or range of potential loss, if estimable.

Additionally, as discussed in FAM 1001.18, the auditor should obtain written representation from management related to litigation, claims, and assessments.

.11 The auditor should perform procedures to learn about certain legal claims against the government involving interaction between the government and its environment. This could include events where federal operations caused (1) hazardous waste for cleanup, (2) accidental damage to nonfederal property, or (3) other damage to federal property. In these cases, no monetary damages are being sought, but rather plaintiffs generally seek that the government either take or cease particular actions, which if the claims are successful, could cost the government significant amounts of money to comply.

An example is a claim that was brought against the Department of Energy over its classification of certain radioactive waste for disposal. Because the classification affected how the waste could be disposed of and thus the cost of disposal, a successful claim could have resulted in a material increase in the entity's environmental liabilities. Auditors should make inquiries of management and legal counsel to determine whether the entity has such cases that could create a loss contingency, and whether the entity considered those cases in determining the amount of liability to be reported or disclosed per table 1002.1. If such cases exist, the auditor should apply the audit procedures in FAM 1002 to these cases as well.

.12 Based on AU-C 501.19 and .20, the auditor should perform procedures to corroborate the information management provides, including seeking direct communication with the entity's legal counsel through a legal counsel request prepared by management and sent by the auditor requesting that legal counsel communicate directly with the auditor. The auditor may assist management with preparing this request. The auditor should also request management to authorize the entity's legal counsel to discuss applicable matters with the auditor (AU-C 501.22).

Legal counsel's response to the legal counsel request is the auditor's primary means of corroborating the information furnished by management concerning the accuracy and completeness of litigation, claims, and assessments. As such, the auditor should document the basis for any determination not to seek direct communication with the entity's legal counsel (AU-C 501.21).

Inquiries of Legal Counsel

.13 Most federal entities have a general counsel (i.e., in-house legal counsel) who has primary responsibility for and knowledge about the entity's litigation, claims, and assessments. The auditor should ask management or the entity's general counsel whether the entity uses external legal counsel whose engagement may be limited to particular matters (e.g., specific litigation).

In the federal government, the main legal counsel outside of the entity is the Department of Justice.[11] Management, the entity's general counsel, or the auditor may consult with Justice and other external legal counsels to verify completeness and accuracy of the presentation of matters related to litigation, claims, and assessments. Such consultation may include requesting a list of pending litigation, claims, and assessments from Justice or other external legal counsel or discussion of specific cases.

.14 The auditor should ask the entity to request that its general counsel cover all litigation, claims, and assessments, including matters handled by Justice and other external legal counsel on behalf of the entity. If Justice or other external legal counsel has overall responsibility for handling and evaluating the entity's litigation, claims, and assessments, the auditor should also seek direct communication with that counsel through a legal counsel request similar to the request made to the entity's general counsel.

.15 When the auditor is aware that the entity has changed legal counsel or that the legal counsel previously engaged by the entity has resigned, the auditor should consider making inquiries of management or others about the reasons such legal counsel is no longer associated with the entity (AU-C 501.24).

.16 Based on AU-C 501.23, the auditor should request, through the legal counsel request discussed in FAM 1002.12, that the entity's legal counsel inform the auditor of any litigation, claims, and assessments that the counsel is aware of, and provide an assessment of the outcome of the litigation, claims, and assessments and an estimate of the financial implications, including losses involved. The legal counsel request should include, but not be limited to, the following matters:

a. identification of the entity, including any subcomponents of the entity, and the date of the audit;

b. a list prepared by management (or a request by management that the legal counsel prepare a list) that describes and evaluates pending or threatened

[11]The Accounting and Auditing Policy Committee (AAPC) guidance (Technical Release No. 1) clarifies FASAB Interpretation No. 2, with respect to Justice's role related to legal counsel responses for cases in which Justice's legal counsels handle legal matters on behalf of other federal reporting entities. The legal counsel response from the entity's general counsel may provide sufficient evidence for the auditor in such cases. If the auditor determines that additional evidence is needed about a specific case, the auditor may request that entity management and the legal counsel send a legal counsel request to Justice, directed to the lead Justice legal counsel handling the case, asking that counsel to provide a description and evaluation of the case directly to the auditor.

litigation, claims, and assessments with respect to which legal counsel has been engaged and to which legal counsel has devoted substantive attention on behalf of the entity in the form of legal consultation or representation;

c. a list prepared by management (or by general counsel if general counsel is part of management) that describes and evaluates unasserted claims and assessments that management considers to be probable of assertion and that, if asserted, would have at least a reasonable possibility of an unfavorable outcome with respect to which legal counsel has been engaged and to which legal counsel has devoted substantive attention on the entity's behalf in the form of legal consultation or representation;

d. regarding each matter listed in item b, a request that legal counsel either provide the following information or comment on those matters on which legal counsel's views may differ from those stated by management, as appropriate:

   i. a description of the nature of the matter, the progress of the case to date, and the action that the entity intends to take (for example, to contest the matter vigorously or to seek an out-of-court settlement);

   ii. an evaluation of the likelihood of an unfavorable outcome and an estimate, if one can be made, of the amount or range of potential loss; and

   iii. with respect to a list prepared by management (or by legal counsel at management's request), an identification of the omission of any pending or threatened litigation, claims, and assessments or a statement that the list of such matters is complete;

e. regarding each matter listed in item c, a request that legal counsel comment on those matters on which legal counsel's views concerning the description or evaluation of the matter may differ from those stated by management;

f. a statement that management understands that whenever, in the course of performing legal services for the entity with respect to a matter recognized to involve an unasserted possible claim or assessment that may call for financial statement disclosure, legal counsel has formed a professional conclusion that the entity should disclose or consider disclosure concerning such possible claim or assessment, legal counsel, as a matter of professional responsibility to the entity, will so advise the entity and will consult with the entity concerning the question of such disclosure and the requirements of the applicable financial reporting framework (generally U.S. GAAP);

g. a request that legal counsel confirm whether the understanding described in item f is correct;

h. a request that legal counsel specifically identify the nature of, and reasons for, any limitation on the response; and

i. a request that legal counsel specify the effective date of the response.

.17 The auditor should ask the entity to request that its legal counsel include in the response all entity components included in the financial statements being audited. Additionally, legal counsel generally should indicate the disposition of cases included in prior year's legal counsel response that are no longer contingencies.

.18 The legal counsel request should be on the entity's letterhead, signed by the CFO or equivalent. The legal counsel request should be sent by the auditor and ask that the response be sent directly to the auditor with a copy to management by specified due dates (see FAM 1002.33–.36 for guidance on timing of legal counsel requests and responses). FAM 1002 B provides an example legal counsel request.

Agree on Materiality Level for Legal Inquiries

.19 The auditor and the entity may agree to limit the legal inquiry to matters that are considered individually or collectively material to the financial statements, provided that the entity and the auditor have reached an understanding on the materiality level. The auditor should ask the entity to indicate the materiality level, if used, in the legal counsel request, and the entity should ask legal counsel to include the materiality in the response.

.20 In determining a legal counsel materiality, the auditor and the entity should set the level sufficiently low so that the cases not included in the legal counsel response would not be material to the financial statements as a whole when aggregated with

a. other cases not included in the legal counsel response,

b. all other types of contingencies,

c. all other items that would not be adjusted because they are judged immaterial (unadjusted misstatements),

d. all other amounts in the financial statements that would not be tested directly because they were judged to be immaterial, and

e. all other items resolved on the basis of materiality considerations.

For example, a threshold that is 5 percent (or less) of performance materiality may be sufficiently low.

.21 In aggregating cases, the auditor and the entity may use two levels of aggregation. First, similar cases are aggregated (such as employment discrimination cases, harbor maintenance fee cases, spent nuclear fuel cases, or military promotion board challenges), treated as a group, and the auditor should compare the total with the individual materiality level. The aggregation generally includes a list of the individual cases and a discussion of the information on the aggregated cases included in the legal counsel response (see FAM 1002 C).

Second, cases not included in the legal counsel response individually or as part of a group of similar cases are aggregated. The auditor may use a higher materiality level for such an aggregation. However, the auditor may set this higher materiality level sufficiently low so that the cases not included in the legal counsel response would not be material to the financial statements as a whole when aggregated with the other items listed in the previous paragraph.

.22 Where the entity engages more than one legal counsel, the entity and the auditor should determine whether matters considered not material individually would exceed the materiality limit when aggregated. In addition, when separate legal counsel responses are requested on individual components (such as bureaus or offices) of a consolidated entity because of individual component audits, the auditor may determine materiality levels for each component.

Evaluation of Legal Counsel Responses

.23 The legal counsel response on legal counsel letterhead is sent to the auditor with a copy to management by specified due dates. Legal counsel may indicate that the response is provided for the auditor's use in connection with the audit. See FAM 1002 C for an example legal counsel response.

.24 The legal counsel response should include matters that existed at the date of the financial statements being reported on and during the period from the date of the financial statements to the date the information is furnished. See FAM 1002.33 through .36 for additional guidance on the timing of legal counsel requests and responses.

.25 Written responses from legal counsel will vary considerably in scope of information provided and opinions expressed. Guidance on preparing responses is contained in the American Bar Association's (ABA) *Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information* (ABA statement) (included in its entirety in AU-C 501 Exhibit A). Although the ABA statement says that legal counsel "may in appropriate circumstances communicate to the auditor his view that an unfavorable outcome is 'probable' or 'remote,'" legal counsel is not required to use those terms in communicating the evaluation to the auditor (AU-C 501.A66). See AU-C 501.A66 for examples of responses the auditor may receive that are either unclear or provide sufficient clarity using other general terms.

.26 The auditor should evaluate each legal counsel response in terms of sufficiency as evidence and consider (a) the possible limitations on the scope of the response and (b) the lack of sufficient opinion on the resolution of a case. The auditor should evaluate any "unable to determine" and vague and unclear responses. The auditor also should evaluate the legal counsel response in light of any other information that comes to the auditor's attention. See AU-C 501.A66 for additional guidance on evaluating legal counsel responses.

.27 To avoid unclear and incomplete responses, the auditor generally should ask management to request that legal counsel use Justice's standard forms to describe legal contingencies.[12] FAM 1002 C provides an example of a legal counsel response that uses Justice's legal contingency standard forms for each case or group of cases. If used, the auditor should verify that current forms were used.

.28 When legal counsel does not indicate whether the unfavorable outcome is probable or remote, (a) management and the auditor should conclude that the outcome is reasonably possible and (b) management should determine the disclosure. If the auditor is not certain about legal counsel's evaluation, the auditor should discuss the matters with legal counsel and management (and document the oral discussion), obtain written clarification from legal counsel, or do both. Sometimes legal counsel may give a clearer indication of likelihood orally. If legal counsel is unable to give a clear evaluation of the likelihood of an unfavorable outcome, management should disclose the uncertainty, and the auditor should evaluate the uncertainty's effect on the audit report.

[12]Forms can be obtained on Justice's website at https://www.justice.gov/civil/documents-and-forms (accessed June 4, 2026).

.29 In circumstances in which legal counsel is unable to respond concerning the likelihood of an unfavorable outcome of litigation, claims, and assessments or the amount or range of potential loss due to inherent uncertainties, the auditor generally should conclude that the financial statements are affected by an uncertainty concerning the outcome of a future event, which is not susceptible to reasonable estimation. See FAM 580 for reporting on uncertainties.

Possible Limitations on the Scope of the Legal Counsel Response

.30 When legal counsel limits the response, the auditor should determine whether the limitation affects the auditor's report. Legal counsel may appropriately limit the response to certain matters. For example, legal counsel may limit the response to matters that (a) legal counsel has given substantive attention to in the form of legal consultation or representation and (b) counsel determined are individually or collectively material to the financial statements, provided the entity and the auditor have reached an understanding on materiality levels. These limitations are acceptable and do not limit the audit scope.

.31 The following are examples of limitations of legal counsel responses that the auditor should not accept and that would ordinarily result in a scope limitation:

a. Legal counsel refuses to furnish the requested information. Based on AU-C 501.25, when legal counsel refuses to respond appropriately to the legal counsel request and the auditor is unable to obtain sufficient appropriate audit evidence by performing alternative audit procedures, or management refuses to give the auditor permission to communicate or meet with the entity's legal counsel, the auditor should modify the opinion in the auditor's report in accordance with AU-C 705, *Modifications to the Opinion in the Independent Auditor's Report*.

b. Legal counsel excludes information requested. The legal counsel response may not address all information requested. The auditor should compare the legal counsel response to the legal counsel request and determine whether legal counsel addressed all of the information requested. If legal counsel has excluded any of the requested information, the auditor should obtain the needed information from legal counsel. If the auditor is unable to obtain all the needed information, the auditor should evaluate this as a scope limitation that could be sufficient to preclude an unmodified opinion.

c. Legal counsel indicates that certain information is being withheld due to attorney-client privilege. Under the ABA Model Rules of Professional Conduct, legal counsel is required to preserve the confidences of the client. Legal counsel may disclose confidences to the auditor only with the consent of the client. If the legal counsel request is prepared in accordance with AU-C 501, *Audit Evidence—Specific Considerations for Selected Items,* the auditor should expect that legal counsel will respond; otherwise, the scope of the audit would be restricted. On the other hand, explanatory language in the legal counsel request or legal counsel response emphasizing that management or legal counsel does not intend to waive attorney-client privilege or attorney work-product privilege does not result in a scope limitation.

Review of Management Schedule

.32 OMB audit guidance requires entities to prepare a management schedule documenting how the information contained in the legal counsel response was

considered in preparing the financial statements (see FAM 1002.08). The auditor should verify that management prepared this schedule. In particular, the auditor should determine whether management has concluded on the likelihood of loss for each case, in order to determine whether (a) an amount should be reported in the financial statements, (b) a note disclosure is necessary, or (c) both. Although most of the information in the management schedule comes directly from the legal counsel response, the auditor should determine whether management has accurately summarized the amounts in the management schedule so that the disposition of each case can be properly reflected in the financial statements. If there are differences between management's and legal counsel's determinations, the auditor should obtain sufficient appropriate evidence to support the reasons for the differences.

Timing of Legal Counsel Requests and Responses

.33 Based on AU-C 501.A54, it is preferable that the legal counsel response be as close to the date of the auditor's report as practicable in the circumstances, and the auditor may specify the effective date of the response to reasonably approximate the date of the auditor's report to avoid the need to obtain updated information from legal counsel. Based on AU-C 501.A55, the auditor may also specify the earliest acceptable effective date of the legal counsel response and the latest date by which it is to be sent to the auditor. If the effective date of the legal counsel response is substantially in advance of the auditor's report date (for example, earlier than 2 weeks before this date), the auditor should obtain an updated legal counsel response on legal counsel letterhead.

.34 To assist the auditor in completing the review of legal matters in a timely manner (and to assist management in preparing the financial statements), the auditor may ask management to request that legal counsel submit a preliminary or interim response covering matters that existed at an interim date so that a preliminary evaluation of the significance of material legal matters can be made. This is particularly applicable to large entities with numerous and complex cases.[13]

If an interim response is used, the auditor should ask management to request that legal counsel submit a final or updated response covering matters from the interim date through a date as close to the auditor's report date as practicable in the circumstances. Management should request that the updated response contain only changes and any new matters or a statement indicating that there are no changes or new matters from the interim response through the date of the updated response. See FAM 1002 B for an example legal counsel request that includes requests for interim and updated responses from legal counsel.

.35 The auditor may determine that it is appropriate to make inquiries of legal counsel and document whether material changes have occurred from the date of the legal counsel response or updated response to the date of the auditor's report. However, if the auditor becomes aware of new matters or aware of material changes in the status of existing matters or management's evaluation of

[13]The *Treasury Financial Manual* (TFM) provides guidance for significant entities to submit their interim and final legal counsel responses, which the Department of the Treasury updates annually through its Year-end Closing Bulletin. For a listing of its published bulletins, see https://tfx.treasury.gov/tfm/bulletins (accessed June 4, 2026).

the outcome, the auditor should obtain a written confirmation or updated response from legal counsel.

.36 To meet deadlines, the auditor, management, and legal counsel generally should coordinate the timing of legal counsel requests, responses (including interim responses), and related management schedules. The auditor and management should determine the due dates for responses from component units for the entity's financial statements as well as for the U.S. government's consolidated financial statements. In setting the due dates, the auditor and management generally should consult with Justice's legal counsel, if applicable.

In addition, for audits of group financial statements, the group auditor and component auditor generally should coordinate the timing of legal counsel requests, responses, and management schedules, and determine the due dates for the component financial statements as well as the group financial statements. The group auditor generally should receive copies of the legal counsel responses and management schedules from the component auditors by these due dates. For significant entities,[14] OMB audit guidance requires the OIG to submit interim and updated responses and management schedules to specified parties by specific dates established by the Department of the Treasury.

[14]See TFM vol. 1, pt. 2, ch. 4700 (TFM 2-4700), for a listing of federal entities identified as significant to the U.S. government's consolidated financial statements (significant entities).

1002 A – Example Audit Procedures for Litigation, Claims, and Assessments

Entity _____

Period of financial statements _____

Job code _____

Example audit procedures	Initials and date	Doc. ref.
I. Testing procedures		
1) Ask management about the entity's policies and procedures for identifying, evaluating, and accounting for litigation, claims, and assessments.		
2) Obtain from management (or the entity's legal counsel) a description and evaluation of litigation, claims, and assessments that existed at the date of the financial statements being reported on and during the period from the date of the financial statements to the date the information is furnished.		
3) Inquire of management or the entity's general counsel whether the entity uses external legal counsel whose engagement may be limited to particular matters (e.g., specific litigation). Ask management for a list of pending litigation, claims, and assessments from the Department of Justice and other external legal counsel, if any. Review related correspondence, legal expense accounts, and invoices.		
4) Ask management whether there have been changes in the status of the general counsel or external legal counsel, such as resignations or intentions to resign. If so, inquire of management or others about the reasons for the resignation or intention to resign. For example, in appropriate circumstances, a legal counsel may be permitted by rules of professional conduct to resign if the legal counsel's advice is disregarded by the entity.		
5) To identify litigation, claims, and assessments, review minutes of meetings of those charged with governance; documents obtained from management concerning litigation, claims, and assessments; and correspondence between the entity and its legal counsel. The auditor may also read contracts and other agreements and leases, noncompliance with which could have a material effect on the financial statements.		

Example audit procedures	Initials and date	Doc. ref.
6) If information comes to the auditor's attention that indicates a potential contingency requiring adjustment to or disclosure in the financial statements with respect to litigation, claims, or assessments, discuss with the entity the need to consult legal counsel. Depending on the severity of the matter, refusal by the entity to consult legal counsel may result in a modification of the opinion in the auditor's report. Determine the effect of such limitation on the auditor's report.		
7) Request that management prepare a legal counsel request to be sent by the auditor to the entity's general counsel asking that the counsel communicate directly with the auditor. The request should cover all litigation, claims, and assessments, including matters handled by Justice or other external legal counsel on behalf of the entity. If Justice or other external legal counsel has overall responsibility for the entity's litigation, claims, and assessments, also request a legal counsel response from that counsel. (See FAM 1002 B for an example legal counsel request.) Coordinate with management and legal counsel to determine • the timing of legal counsel requests, responses, and related management schedules and • a materiality level to be included in the legal counsel response.		
8) Read the legal counsel response and management schedule to identify litigation, claims, and assessments.		
9) Compare the description and evaluation of the current year's legal counsel response to the prior year's audit documentation. If this comparison indicates that certain legal matters in the prior year are no longer included, discuss these matters with management or legal counsel to obtain an understanding of the reasons for the changes.		
10) Determine whether the information in the legal counsel response is consistent with the related management schedule. If there are differences between management's and legal counsel's determinations, obtain sufficient appropriate evidence to support the reasons for the differences.		
11) Document and discuss with the entity's legal counsel if the information obtained is not complete, clear, or consistent.		

Example audit procedures	Initials and date	Doc. ref.
12) Evaluate the legal counsel response and determine the effects of the response on liabilities and related note disclosures in the financial statements and on the auditor's report.		
13) If the effective date of the response is substantially in advance of the auditor's report date, for example, an interim response or a response earlier than 2 weeks before the auditor's report date, obtain an updated legal counsel response on legal counsel letterhead. The auditor may determine that it is appropriate to make inquiries of legal counsel and document whether material changes have occurred from the date of the legal counsel response or updated response to the date of the auditor's report. However, if the auditor becomes aware of new matters or material changes in the status of existing matters or management's evaluation of the outcome, the auditor should obtain a written confirmation or updated response from legal counsel.		
II. Reporting procedures 1) Obtain representation from management in the management representation letter related to litigation, claims, and assessments (see FAM 1001).		
2) Read the entity's financial statements and notes. a) Determine whether contingencies for litigation, claims, and assessments are properly reported in the financial statements.		
b) Evaluate the adequacy of note disclosures for these contingencies, including whether they are prepared in accordance with OMB reporting guidance.		
c) For entities involved in litigation for which the Judgment Fund is a likely source of judgment or settlement, determine if a note to the financial statements discusses the Judgment Fund's role in the payment of a possible loss, as required by FASAB Interpretation No. 2, *Accounting for Treasury Judgment Fund Transactions*.		
3) Document conclusions reached concerning the accounting for and disclosure of litigation, claims, and assessments; determine if adjustments are necessary and whether modification of the auditor's report is necessary (see FAM 580).		

1002 B – Example Legal Counsel Request

[Audited Entity Letterhead]

[Date]
[General Counsel]
[Entity or Firm Name]
[City]

Subject: **[Auditor's]** Audits of 20X2 and 20X1[15] Financial Statements

Pursuant to **[cite applicable legal authority to conduct the audit, such as 31 U.S.C. § 3521]**, **[auditor's name]** is auditing the financial statements of **[Entity]** as of and for the years ended September 30, 20X2, and 20X1. In performing financial statement audits of government entities, auditors comply with *Government Auditing Standards*, issued by the Comptroller General of the United States. *Government Auditing Standards* incorporates the Statements on Auditing Standards promulgated by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA).

Consistent with the *U.S. Auditing Standards—AICPA [Clarified]* (AU-C), section 501, *Audit Evidence – Specific Considerations for Selected Items*, **[auditor]** has inquired about litigation, claims, and assessments to obtain evidence of the financial accounting and reporting of such matters in the financial statements. The purpose of this request is to obtain your assistance in responding to that inquiry and to provide our consent to furnish our auditor with the information requested herein. The American Bar Association's *Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information* (December 1975) provides guidance for a lawyer's response to an auditor's request.

In accordance with Statement of Federal Financial Accounting Standards (SFFAS) 5, *Accounting for Liabilities of the Federal Government*, as amended by SFFAS 12, and Interpretation No. 2 of SFFAS 4 and 5, **[Entity]** may need to report certain information in its financial statements and notes concerning contingencies for litigation, claims, and assessments. We request that you provide **[auditor]** (with a copy to me) information on matters with respect to which you have been engaged and to which you have devoted substantive attention on behalf of **[Entity]** in the form of legal consultation or representation.

Please furnish an interim response to our auditor on legal counsel letterhead by **[due date]**, including matters that existed as of **[date appropriate for the audit]**. Our auditor would appreciate receiving your updated or final response on legal counsel letterhead by **[due date]** that includes matters that existed at **[date of financial statements]** and during the period from that date through the effective date of your response, which should be no earlier than **[effective date]**. The final response should separately identify any new matters or significant changes from the interim response, or include a statement that there are no new matters or significant changes, and should specify the effective date of the response. **(Note: <u>The auditor and the entity should determine whether to request an interim legal counsel response based on the circumstances of the audit. Refer to FAM 1002.34.</u>)**

[15]Note to auditor: 20X2 denotes the current year, and 20X1 denotes the prior year.

Please include any cases[16] with respect to which you have been engaged and to which you have devoted substantive attention on behalf of **[Entity]** in the form of legal consultation or representation, including those cases for which you believe the Judgment Fund or other external financing source will pay any potential loss. Under U.S. generally accepted accounting principles, these amounts will be included as liabilities or disclosure items in **[Entity]**'s financial statements. Please aggregate cases similar in nature where appropriate. Please list the matters in order of the amount of potential loss, starting with the largest.

Pending or Threatened Litigation, Claims, and Assessments (Excluding Unasserted Claims)

We have determined that any matters for which (1) the amount of potential loss exceeds **[$XX]**, individually or in the aggregate for similar cases, or (2) the amount of potential loss exceeds **[$XXX]** in the aggregate for cases not listed individually or as part of similar cases could be material to the financial statements. We request that you provide to **[auditor]** the information described below about pending or threatened litigation, claims, and assessments where the amount of potential loss exceeds these amounts:

1. The nature of the matter. Include a description of the case or cases and amount claimed, if specified.

2. The progress of the case to date.

3. The government's response or planned response (for example, to contest the case vigorously or to seek an out-of-court settlement).

4. An evaluation of the likelihood of unfavorable outcome. Please categorize likelihood as probable (an unfavorable outcome is likely to occur), reasonably possible (the chance of an unfavorable outcome is less than probable but more than remote), or remote (the chance of an unfavorable outcome is slight).

5. An estimate of the amount or range of potential loss, if one can be made, for losses considered to be probable or reasonably possible.

6. The name of **[Entity]**'s legal counsel handling the case and names of any external legal counsel/other lawyers representing or advising the government in the matter (e.g., the Department of Justice or external law firms).

Additionally, please provide a statement that the list of such matters is complete.

We also request that you identify litigation reported in your prior-year response letter as pending or threatened that is no longer pending or threatened and a short description of the disposition.

Unasserted Claims and Assessments [Considered by management to be probable of assertion and that if asserted would have at least a reasonable possibility of an unfavorable outcome]

(Note: <u>If legal counsel is a part of management use this paragraph to request a list of</u>

[16]This includes any cases that do not seek monetary damage awards but would require the government to use financial resources to implement remedies or actions sought by litigation or unasserted claims (for example, to increase the scope of, or change to a more costly methodology of, environmental restoration and cleanup).

unasserted claims instead of the next paragraph.) For all unasserted claims and assessments that you consider to be probable of assertion and that if asserted would have at least a reasonable possibility (more than remote) of an unfavorable outcome for which (1) the amount of potential loss exceeds **[$XX]**, individually or in the aggregate for similar cases, or (2) the amount of the potential loss exceeds **[$XXX]** in the aggregate for cases not listed individually or as part of similar cases, please provide the following information:

1. A description of the nature of the matter.

2. The government's planned response if the claim is asserted.

3. An evaluation of the likelihood of an unfavorable outcome. (Categorize likelihood as probable (likely to occur) or reasonably possible (less than probable but more than remote).)

4. An estimate of the amount or range of potential loss, if one can be made.

Also, please include a statement that the list of such matters is complete.

(Note: If legal counsel is not part of management, such as an external legal counsel, use this paragraph instead of the previous paragraph and attach management's listing of unasserted claims.) We have provided an attachment to this request that lists the unasserted claims and assessments involving matters to which you have devoted substantive attention that we consider to be probable of assertion and that if asserted would have at least a reasonable possibility (more than remote) of an unfavorable outcome for which (1) the amount of potential loss exceeds **[$XX]**, individually or in the aggregate for similar cases, or (2) the amount of potential loss exceeds **[$XXX]** in the aggregate for cases not listed individually or as part of similar cases. Please provide to **[auditor]** information or explanations, if any, that you consider necessary to supplement the attached information, including an explanation for any matters for which your views differ from those stated in the attachment. Please provide the following information for any additional matters that you believe meet these criteria or include a statement that the list of such matters provided by management is complete:

1. A description of the nature of the matter.

2. The government's planned response if the claim is asserted.

3. An evaluation of the likelihood of an unfavorable outcome. (Categorize likelihood as probable (likely to occur) or reasonably possible (less than probable but more than remote).)

4. An estimate of the amount or range of potential loss, if one can be made.

We understand that whenever, in the course of performing legal services for us with respect to matters recognized to involve an unasserted possible claim or assessment that may call for financial statement disclosure, you have formed a professional conclusion that we should disclose or consider disclosure concerning such possible claim or assessment, as a matter of professional responsibility to us, you will so advise us and will consult with us concerning the question of such disclosure and the applicable requirements of SFFAS 5, as amended. Please specifically confirm to **[auditor]** that our understanding is correct.

We request that you describe the cases using the following Department of Justice forms: (1) Pending or Threatened Litigation, (2) Unasserted Claims and Assessments, and (3) Claims Reported in Prior Year That Are No Longer Pending. The current forms and instructions are

available at https://www.justice.gov/civil/documents-and-forms (accessed June 4, 2026). **(Note: Update link as necessary.)**

With respect to those matters that you have been engaged and to which you have devoted substantive attention on behalf of **[entity]** in the form of legal consultation or representation, please separately identify any pending or threatened litigation and unasserted claims, along with the name of the other governmental entity(s) that you believe to be defendants and responsible for any potential liability.

Please specifically identify the nature of and reasons for any limitations in your response to this request.

Please address your reply **to [Insert name, Director, GAO, or commensurate inspector general official]**, and contact **[him/her]** at **[phone number]**, when your reply is available for pick up and send a copy of your reply to me. Do not hesitate to contact me or **[auditor]** if you have any questions about this request.

1002 C – Example Legal Counsel Response

[General Counsel Letterhead]

[Date]
[Auditor]
[Title]
[Entity or Firm Name]
[City]

Subject: Legal Counsel Response in Connection with the 20X2 and 20X1[17] Financial Statement Audits of **[Entity]**

Dear **[Auditor]**:

As General Counsel of **[Entity]**, I am writing in response to the legal counsel request from **[Entity]**'s Chief Financial Officer (CFO) dated **[date]**, in connection with the audit of **[Entity]**'s financial statements as of and for the years ended September 30, 20X2, and 20X1. **[In an interim response, add "I will, as further requested by the CFO, provide an updated response by [date]."]**

I call your attention to the fact that as General Counsel for **[Entity]**, I have general supervision of **[Entity]**'s legal affairs. **[If the general legal supervisory responsibilities of the person signing the response letter are limited, set forth a clear description of those legal matters over which the signer exercises general supervision, indicating exceptions to such supervision and situations where the auditor may primarily rely on other sources.]** In such capacity, I have reviewed litigation, claims, and assessments threatened or asserted involving **[Entity]** and have consulted with external legal counsel about them when I have deemed it appropriate.

Subject to the foregoing and to the last paragraph of this response letter, I advise you that since [insert date of beginning of period under audit] neither I, nor any of the lawyers over whom I exercise general legal supervision, have given substantive attention to or represented **[Entity]** in connection with (1) loss contingencies **[over the amount of (state the legal counsel materiality agreed to with auditor and stated in the legal counsel request, for example, $1 million for cases listed individually or in the aggregate for similar cases)]**, or (2) loss contingencies that are less than or equal to **[for example, $1 million]** but in the aggregate exceed **[for example, $5 million for cases not listed individually or as part of similar cases]** coming within the scope of clause (a) of paragraph 5 of the Statement of Policy referred to in the last paragraph of this response letter, except as follows:

[Describe litigation, claims, and assessments that fit the foregoing criteria as follows. General Counsel should use current Department of Justice forms to describe the cases (one for pending or threatened litigation, another for unasserted claims and assessments); see the Department of Justice website at https://www.justice.gov/civil/documents-and-forms (accessed June 4, 2026).[18]]

[17]Note to auditor: 20X2 denotes the current year, and 20X1 denotes the prior year.

[18]It is expected that cases or matters will be aggregated where appropriate.

Pending or Threatened Litigation, Claims, and Assessments

(Excluding unasserted claims and assessments, which are discussed below.)

1. Nature of the matter (include a description of the case or cases and amount claimed, if specified).

2. Progress of the case to date.

3. Current or intended response.

4. Evaluation of the likelihood of an unfavorable outcome (categorize likelihood as probable, reasonably possible, or remote).

5. Estimated amount or range of potential loss, if determinable, for losses considered to be probable or reasonably possible.

6. Name of **[Entity]**'s legal counsel handling the case and names of any external legal counsel representing or advising the government in the matter.

[Identify omission of any pending or threatened litigation, claims, and assessments or add a statement that the list of such matters is complete.]

Pending or threatened litigation that was reported in the prior year's response letter, which is no longer pending or threatened, is as follows:

[Identify litigation with a short description of its disposition.]

With respect to matters that have been specifically identified as contemplated by clauses (b) or (c) of paragraph 5 of the American Bar Association's (ABA) *Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information* (December 1975), I advise you, subject to the last paragraph of this response letter, as follows.

Unasserted Claims and Assessments

(Considered to be probable of assertion and that if asserted would have at least a reasonable possibility of an unfavorable outcome.)

1. Nature of the matter.

2. Intended response if claim would be asserted.

3. Evaluation of the likelihood of an unfavorable outcome. (Categorize likelihood as probable or reasonably possible.)

4. Estimated amount or range of potential loss, if determinable.

* * * * *

The information set forth herein is as of the date of this response letter **OR [as of [insert date], the effective date on which we commenced our internal review procedures for purposes of preparing this response]**, except as otherwise noted. **[If an interim response, add "Upon receipt of a request to update the response, I will provide an updated response, which is due on [date],"] [If a final response: I disclaim any undertaking to advise you of changes that after the date of this response letter, may be brought to my attention or the attention of lawyers over whom I exercise general legal supervision.]**

(The following language is generally consistent with AU-C 501 Exhibit A.)

This response is limited by, and in accordance with, the ABA *Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information* (December 1975). Without limiting the generality of the foregoing, the limitations set forth in such statement on the scope and use of this response (paragraphs 2 and 7) are specifically incorporated herein by reference, and any description herein of any "loss contingencies" is qualified in its entirety by paragraph 5 of the statement and the accompanying commentary (which is an integral part of the statement).

Consistent with the last sentence of paragraph 6 of the ABA *Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information* (December 1975), this will confirm as correct **[Entity]**'s understanding that whenever, in the course of performing legal services for **[Entity]** with respect to a matter recognized to involve an unasserted possible claim or assessment that may call for financial statement disclosure, I have formed a professional conclusion that **[Entity]** must disclose or consider disclosure concerning such possible claim or assessment. I, as a matter of professional responsibility to **[Entity]**, will so advise **[Entity]** and will consult with **[Entity]** concerning the question of such disclosure and the applicable requirements of Statement of Federal Financial Accounting Standards (SFFAS) 5, *Accounting for Liabilities of the Federal Government*, as amended by SFFAS 12, and Interpretation No. 2 of SFFAS 4 and 5.

[Describe any other or additional limitation as indicated by paragraph 4 of the statement.]

Sincerely,

_____

[Name of General Counsel]
[Title]

cc: Chief Financial Officer

Attachments (DOJ forms or other case information)

1002 D – Example Management Schedule

OMB audit guidance requires entity management to document in a schedule how the information contained in the legal counsel response was considered in preparing the financial statements. Management should include each case discussed in the legal counsel response and (1) indicate the amount accrued for probable cases and (2) include information to support the note disclosure for reasonably possible cases and "unable to determine" cases, probable cases where the amount cannot be estimated, and probable cases where a range of amounts above the accrued amount is estimated. The financial reporting treatment for cases where the likelihood of future outflow or other sacrifice of resources is assessed as "unable to determine" should be consistent with the disclosure requirements for reasonably possible cases. Per the *Treasury Financial Manual*, entities significant to the consolidated financial statements of the U.S. government should avoid excessive use (and misuse) of the "unable to determine" assessment. This likelihood should only be used to categorize cases for which the general counsel is unable to express an opinion because of inherent uncertainties.

Management's Schedule of Information Contained in the Legal Counsel Response
for Financial Reporting Purposes
Effective Date:

Reported in Actual Amounts

	Name of Component A	Name of Component B								
Entity (list component entities separately to the right, if applicable): Entity materiality level for reporting (ensure consistency with underlying legal counsel response):										
Individual cases or the aggregate for similar cases										
Cases not listed individually or as part of a group of similar cases										
Points of Contact:										
Management Schedule - *Name, email address, phone number*										
Legal Counsel Response - *Name, email address, phone number*										

1	2	3	4		5	6	7				8	9	10	11	12	13	14	15	16	17	18	19	20
Fiscal Service reference key, if a significant entity (*must correspond to same case from interim to final*)	Entity reference key	Name of case/ related cases	(a) Type of contingency (legal or legal-environmental)	(b) Description of Contingency	Amount claimed	Likelihood of loss Probable/ Reasonably Possible/ Remote/ Unable to Determine	Estimated Amount or Range of Potential Loss [*enter single amount in dollars, or "U" in last column if Unknown*]				Is assessment of case(s) on the management schedule consistent with the assessment of case(s) by general counsel in the supporting interim or updated legal counsel response?	Provide a brief description of inconsistencies noted in column 8.	Is the legal case considered a "shared case" with another entity?	Is this case related to a treaty or international agreement?	Disposition in Financial Statements		For amounts recorded in column 12 and note disclosures indicated in column 13, did the entity record/disclose the estimated loss (i.e., dollar amounts) for probable and reasonably possible cases in accordance with requirements in SFFAS No. 5, paras. 38-41?	Do the amounts recorded in column 12 and note disclosures indicated in column 13 agree with the amounts in column 7?	Provide an explanation for any "No" responses in columns 14 and/or 15.	If updates to case(s) were provided in the final legal counsel response, were these updates related to likelihood of loss, estimated amount or range of potential loss, new case, no longer pending, progress update, other, or no updates since interim? (This requirement only applies to the final management schedule.)	Provide a brief description of the update entered in column 17.	If the lead counsel for the case is external to the entity (e.g., DOJ), does the lead counsel concur with the entity's assessments of the likelihood of loss and estimated amount or range of potential loss? If the lead counsel is not external to the entity, input "N/A."	Provide an explanation for any "No" responses in column 19.
							(a) P	(b) RP	(c) Upper	(d) Unknown					Amount recorded on Balance Sheet	Note disclosure (*enter financial statement note number*)							
Probable																							
1																							
2																							
3																							
insert rows here as necessary																							
Total # of cases - 3	Total Probable																						
Reasonably Possible																							
4																							
5																							
6																							
insert rows here as necessary																							
Total # of cases - 3	Total Reasonably Possible																						
Remote																							
7																							
8																							
9																							
insert rows here as necessary																							
Total # of cases - 3	Total Remote																						
Unable to Determine																							
10																							
11																							
12																							
insert rows here as necessary																							
Total # of cases - 3	Total Unable to Determine																						
Unasserted Claims and Assessments																							
13																							
14																							
15																							

****insert rows here as necessary****																			
Total # of claims - 3	Total Unasserted Claims and Assessments																		

Reconciliation - Management Schedule to Financial Statements	Management Schedule totals	Financial Statements or other totals	Variance	Explanation for variance
Accrued probable Probable low end of range Probable high end of range Reasonably possible low end of range Reasonably possible high end of range				

Instructions for Management Schedule Completion (by column):

(1) Fiscal Service Reference Key (if a significant entity) - Assign a numeric value to each case that will be used by the Department of the Treasury's Bureau of the Fiscal Service to identify the matter throughout the legal counsel response reporting process for the current fiscal year. This value will not change from interim through the final legal counsel response update.

(2) Entity Reference Key - Enter the entity's reference number for identifying the case(s) listed on each line. This represents the page number of the legal counsel response obtained from general counsel discussing the case, or other reference information.

(3) Name of case/related cases - Enter the case name or name of aggregated cases from field 1 on DOJ's "Pending or Threatened Litigation" form or for unasserted claims and assessments, enter the name of the matter from field 1 on DOJ's "Unasserted Claims and Assessments" form.

(4) (a) Type of contingency – Enter either "legal" or "legal-environmental"
(b) Description of contingency - Enter a description of the case(s) from field 2 on DOJ's "Pending or Threatened Litigation" form or from DOJ's "Unasserted Claims and Assessments" form.

(5) Amount claimed - If specified, enter the claim amount (single dollar estimate) for the litigation, claim, or assessment as specified on the supporting legal counsel response prepared by the entity's general counsel.

(6) Likelihood of loss - Indicate management's evaluation of the likelihood of loss on individual or aggregated cases. Input "Probable" (loss more likely than not to occur, except for pending/threatened ligation and unasserted claims for which loss is likely to occur), "Reasonably Possible" (the chance of loss is less than probable, but more than remote), "Remote" (the chance of loss is slight), or "Unable to Determine" (per the *Treasury Financial Manual*, entities significant to the consolidated financial statements of the U.S. government should avoid excessive use and misuse of the "unable to determine" assessment; this likelihood should only be used to categorize cases for which the general counsel is unable to express an opinion because of inherent uncertainties). The evaluation should be consistent with the supporting legal counsel response prepared by the entity's general counsel.

(7) Estimated amount or range of potential loss (should be consistent with the supporting legal counsel response prepared by the entity's general counsel):

(a) Probable - For single estimate, enter single estimate in Column 7(a) **and** Column 7(c). For estimated range, enter low end of the range in Column 7(a) and upper end of the range in Column 7(c).
(b) Reasonably Possible - For single estimate, enter single estimate in Column 7(b) **and** Column 7(c). For estimated range, enter low end of the range in Column 7(b) and upper end of the range in Column 7(c).
(c) Upper - Enter the single estimate **or** the upper end of the range of potential loss for probable and reasonably possible cases.
(d) Unknown - Enter "U" if estimated amount or range of potential loss cannot be determined.

(8) Is assessment of case(s) on the management schedule consistent with the assessment of case(s) by general counsel in supporting the interim or updated legal counsel response? - Indicate whether the likelihood of loss (Column 6) **and** estimated amount or range of potential loss (Column 7) for the case(s) is consistent with the supporting interim or updated legal counsel response prepared by the entity's general counsel (i.e., responses to fields 5-6 on DOJ's "Pending or Threatened Litigation" form or to fields 4-5 on DOJ's "Unasserted Claims and Assessments" form) by entering "Yes – Interim legal counsel response," "Yes – Updated legal counsel response," or "No."

(9) Provide a brief description of inconsistencies noted in column 8. - If entity management's assessment of likelihood of loss (Column 6) **and** estimated amount or range of potential loss (Column 7) differs from that of the entity's general counsel's (i.e., responses to fields 5-6 on DOJ's "Pending or Threatened Litigation" form or to fields 4-5 on DOJ's "Unasserted Claims and Assessments" form), provide a brief description of and explanation for the inconsistency.

(10) In cases in which more than one entity is affected, entities must collaborate with each other on shared cases to ensure appropriate reporting. Responsibility for the case must be allocated among affected entities to ensure that 100 percent of the contingency is accounted for. Is the legal case considered a "shared case" with another entity?

(11) Is this case related to a treaty or international agreement? - Enter "Yes" or "No."

(12) Disposition in Financial Statements: amount recorded as a liability on the balance sheet - For probable contingencies that are reasonably estimable, enter the single estimate amount or low end of the range recorded on the entity's balance sheet.

(13) Disposition in Financial Statements: note disclosure - For probable contingencies where the estimated loss is a range of amounts, provide the financial statement note number where the entity discloses the range and a description of the nature of the contingency (SFFAS 5, para. 39). For reasonably possible contingencies where the estimated loss amount or range can be reasonably measured, provide the financial statement note number where the entity discloses the nature of the contingency and an estimate of the possible liability (SFFAS No. 5, paras. 40–41). For probable and reasonably possible contingencies where the estimated loss amount cannot be reasonably measured, provide the financial statement note number where the entity discloses the nature of the contingency and a statement that an estimate of the potential loss amount cannot be made (SFFAS No. 5, paras. 40–41). For contingencies where the likelihood of loss is not able to be determined and the estimated loss amount cannot be reasonably measured, provide the financial statement note number where the entity discloses the nature of the contingency and a statement that an estimate of the potential loss amount cannot be made.

(14) For amounts recorded in column 12 and note disclosures indicated in column 13, did the entity record/disclose the estimated loss, that is, dollar amounts, for probable and reasonably possible cases in accordance with requirements in SFFAS No. 5, paras. 38–41, - For probable and reasonably possible contingencies, indicate whether the entity reports, discloses, or both the amounts of potential loss (dollar amounts) on the financial statements, in the notes to the financial statements, or both in alignment with guidance in SFFAS No. 5, paras. 38–41.

(15) Do the amounts recorded in column 12 and note disclosures indicated in column 13 agree with the amounts in column 7?

(16) Provide an explanation for any “No” responses in column 14, column 15, or both. - Provide an explanation for any instances in which the entity did not record on the financial statements or disclose in the notes to the financial statements contingencies meeting the criteria for recognition and/or disclosure in SFFAS No. 5, pars. 39-41.

(17) If updates to case(s) were provided in the final legal counsel response, were these updates related to likelihood of loss, estimated amount or range of potential loss, new case, no longer pending, progress update, other, or no updates since interim? - Indicate whether there were updates to case(s) between the entity’s interim and final legal counsel responses. If there is more than one type of update from interim, input one type of update (i.e., likelihood of loss, estimated amount or range of potential loss, new case, no longer pending, progress update, or other) and describe **all** applicable updates in column 18. This requirement only applies to the final management schedule.

(18) Provide a brief description of the update entered in column 17. - Describe updates to likelihood of loss, estimated amount or range of potential loss, and/or other change indicated in column 17. At a minimum, be sure to include any updates to likelihood of loss and estimated amount or range of potential loss. This requirement only applies to the final management schedule.

(19) If the lead counsel for the case is external to the entity (e.g., DOJ), does the lead counsel concur with the entity's assessments of the likelihood of loss and estimated amount or range of potential loss? If the lead counsel is not external to the entity, input “N/A.” - For circumstances where the lead representation is external to the entity (e.g., DOJ), indicate whether the lead attorney concurs with the entity's general counsel’s assessments of the case's likelihood of loss **and** estimated amount or range of potential loss (i.e., responses to fields 5-6 on DOJ’s “Pending or Threatened Litigation” form or to fields 4-5 on DOJ’s “Unasserted Claims and Assessments” form).

(20) Provide an explanation for any “No” responses in column 19. - Provide an explanation for any circumstances where the entity’s general counsel’s assessments of a case (e.g., likelihood of loss, estimated amount or range of potential loss, or both) differ from those of the lead counsel handling the case.

1003 – Financial Statement Audit Completion Checklist

Entity: _____

Job Code: _____

Principal Report: _____

Other Reports (including separate reports to management and testimonies): _____

Instructions

This checklist is intended to help financial statement auditors determine whether they have complied with *Government Auditing Standards* (GAGAS), *U.S. Auditing Standards—AICPA [Clarified]* (AU-C), and the GAO/CIGIE *Financial Audit Manual* (FAM). This checklist contains selected procedures for achieving audit objectives. It does not contain all procedures that should be performed to achieve the audit objectives. The auditor is responsible for ensuring that all relevant audit requirements are met. This checklist should be completed as described below.

- **On or before the auditor's report date** (i.e., audit completion date):
  - The auditor-in-charge (AIC) should ensure that sections I through VII of this checklist are completed and then sign in section VII.
  - The assistant director and first partner (audit director) should review sections I through VII and then sign in section VII.

  Section V, GAO's Quality Control, is intended for GAO auditors only. Non-GAO auditors may adapt this section to their respective audit organizations as appropriate.
- **On or before the report release date**:
  - The AIC should complete and then sign in section VIII.
  - The assistant director and first partner should review and then sign in section VIII.
  - The reviewer (second partner) should review all sections of this checklist and then sign in section IX.

The detailed questions in this checklist are to be answered "yes," "no," or "N/A." For most questions, "no" answers indicate departures from professional standards or the FAM. The auditor should explain all "no" answers in section VI of this checklist and determine their effect and significance, including any effect on the auditor's report. Auditors should enter "N/A" when an item does not exist or when the item exists but is judged to be immaterial. Because the checklist is designed for a wide range of financial statement audits, there may be many "N/A" answers. If the reason that a question is not applicable is not obvious, the auditor should document the reason on the checklist or in an attachment. It is not necessary to create additional documentation to support "yes" answers, but a "Ref." column is provided for the auditor to insert a reference to related audit documentation. For most questions, there is a reference to professional literature that provides more detail.

References

U.S. Auditing Standards—AICPA [Clarified].....AU-C
GAO/CIGIE *Financial Audit Manual*.....FAM
Government Auditing Standards (2018 revision).....GAGAS

Section I: Planning and Risk Assessment

Section I: Planning and Risk Assessment	Yes, No,* N/A	Doc. ref.
1. Has the auditor documented that it has		
a. established an understanding with the entity's management and, when appropriate, those charged with governance on the terms of the audit engagement, including the objectives and scope of the work; management's responsibilities; auditors' responsibilities; and the expected form and content of reports on the financial statements, internal control, and compliance and		
b. issued an audit engagement letter or other suitable form of written agreement to describe the terms of the audit engagement and obtained agreement from management that it acknowledges and understands its responsibility? (FAM 215)		
2. If, prior to completing the audit engagement, the terms of the audit engagement are changed, does the audit engagement letter or other suitable form of written agreement contain the new terms of the audit engagement? (FAM 215)		
3. Was an entrance conference held and documented? (FAM 215)		
4. Does the audit documentation contain an understanding of the entity and its environment, the applicable financial reporting framework (generally U.S. GAAP), and the entity's internal control sufficient for assessing risk and planning the audit? (FAM 290 and 390)		
5. Does the audit documentation contain an adequate audit strategy and audit plan? (FAM 290)		
6. Did the auditor adequately plan the audit, including performing the following: (FAM 290)		
a. Determine whether the engagement team can comply with relevant ethical requirements, including independence requirements? (FAM 215)		
b. Perform preliminary analytical procedures? (FAM 225)		
c. Determine materiality? (FAM 230)		
i. Did the auditor consider intragovernmental and offsetting balances when determining materiality?		

Section I: Planning and Risk Assessment	Yes, No,* N/A	Doc. ref.
d. Identify material line items, accounts, note disclosures, and classes of transactions; applicable assertions; significant business process applications; and significant manual processes? (FAM 235)		
e. Identify significant provisions of applicable laws and regulations? (FAM 245)		
f. Determine the approach for identifying and testing significant provisions of contracts and grant agreements? (FAM 245)		
g. Identify relevant budget restrictions? (FAM 250)		
h. Evaluate the design of the five components of internal control and determine whether they have been implemented? (FAM 260)		
i. Identify the methodology the auditor plans to use to assess IS controls and document the basis for determining that such methodology is appropriate? (GAO auditors should use the *Federal Information System Controls Audit Manual (*FISCAM).) (FAM 260)		
j. Design the audit to achieve an acceptable level of audit assurance that the financial statements as a whole are free from material misstatement, whether due to fraud or error? (GAO uses 95 percent.) (FAM 265)		
k. Brainstorm among the engagement team members, including the first/engagement partner, about how and where the entity's financial statements (at the financial statement and assertion levels) might be susceptible to material misstatement due to fraud or error, how management could perpetrate and conceal fraudulent financial reporting, and how assets of the entity could be misappropriated? (FAM 265)		
l. Identify the risks of material misstatements due to error or fraud at the financial statement and assertion levels, including any related to revenue recognition, management override of controls, significant unusual transactions, disclosure entities, related parties, and public-private partnerships; and exercise professional skepticism throughout the audit? (FAM 265)		

Section I: Planning and Risk Assessment	Yes, No,* N/A	Doc. ref.
m. Assess the risks of material misstatements due to error or fraud at the financial statement level and design overall responses to address them? (FAM 265)		
n. Assess inherent risk for each identified risk of material misstatement at the assertion level? (FAM 265)		
o. Identify relevant operations controls to evaluate and test? (FAM 270)		
p. Plan other procedures (e.g., legal inquiries, management representations, RSI, other information, and relationships and transactions with disclosure entities, related parties, and public-private partnerships)? (FAM 280)		
q. Plan locations to test? (FAM 285)		
r. Consider the appropriateness of performing interim substantive testing? (FAM 295 D)		
s. Determine staffing and review requirements? (FAM 290)		
t. Determine audit timing, including milestones and the estimated date of the auditor's report? (FAM 290)		
u. Determine the extent of assistance from entity personnel? (FAM 290)		
7. Does the audit strategy consider findings and recommendations from previous audits that could affect the current audit objectives? (GAGAS (2018) 6.11)		
8. Did the auditor identify compliance controls over significant provisions of applicable laws, regulations, contracts, and grant agreements? (FAM 245, 310, and 330)		

Section I: Planning and Risk Assessment	Yes, No,* N/A	Doc. ref.
9. If expertise in a field other than accounting or auditing is necessary to obtain sufficient appropriate audit evidence, did the auditor plan to use the work of an auditor's specialist (e.g., IT specialist, actuary, or specialist who determines value of assets)? (FAM 620) Also, see section III of this checklist.		
10. In addition to the questions above, answer the following regarding whether the auditor achieved the following objectives (AU-C 200.23):[19]		
a. For a new or existing audit client, did the auditor: • establish whether the preconditions for an audit are present and • confirm that a common understanding of the terms of the audit engagement exists between the auditor and management and, when appropriate, those charged with governance? (AU-C 210)		
b. Did the auditor identify and assess the risks of material misstatement of the financial statements due to fraud? (AU-C 240.10a)		
c. Did the auditor • communicate clearly with those charged with governance the responsibilities of the auditor regarding the financial statement audit and an overview of the planned scope and timing of the audit, including significant risks identified by the auditor, and • obtain from those charged with governance information relevant to the audit? (AU-C 260)		

[19]AU-C 200.23 states that to achieve the overall objectives of the auditor (see FAM 110.24), the auditor should use the objectives stated in individual AU-C sections in planning and performing the audit, considering the interrelationships within U.S. generally accepted auditing standards to (a) determine whether any audit procedures in addition to those required by individual AU-C sections are necessary in pursuance of the objectives stated in each AU-C section and (b) evaluate whether sufficient appropriate audit evidence has been obtained. AU-C 200.29 further states that if an objective in a relevant AU-C section cannot be achieved, the auditor should evaluate whether this prevents the auditor from achieving the overall objectives of the auditor and thereby requires the auditor to modify the auditor's opinion or withdraw from the engagement when withdrawal is possible under applicable law or regulation. Failure to achieve an objective represents a significant finding or issue requiring documentation in accordance with AU-C 230, *Audit Documentation*. See AU-C 200.A90 and .A91 for further guidance.

Section I: Planning and Risk Assessment	Yes, No,* N/A	Doc. ref.
d. Did the auditor identify and assess the risks of material misstatement, whether due to fraud or error, at the financial statement and assertion levels through understanding the entity and its environment, the applicable financial reporting framework (generally U.S. GAAP), and the entity's internal control, thereby providing a basis for designing and implementing responses to the assessed risks of material misstatement? (AU-C 315)		
e. Did the auditor plan the audit so that it will be performed in an effective manner? (AU-C 300)		
f. Did the auditor apply the concept of materiality appropriately in planning and performing the audit? (AU-C 320)		
g. Did the auditor obtain an understanding of the nature and significance of the services provided by the entity's service organization(s) and their effect on the entity's internal controls relevant to the audit, sufficient to identify and assess the risks of material misstatement? (AU-C 402)		

Section II: Performing the Engagement

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
1. Did the auditor prepare the following documentation or equivalent summarizing considerations in planning and performing audit procedures for material line items, accounts, note disclosures, and classes of transactions (FAM 290 and 390):		
a. Cycle matrix that links material line items, accounts, note disclosures, and classes of transactions to the related significant business process applications, significant manual processes, line item risk analysis (LIRA) forms, and cycles, as applicable? (FAM 235)		
b. LIRA forms? (FAM 235 and 395 H)		
c. Cycle memorandum? (FAM 320)		
d. Specific control evaluation (SCE) worksheets? (FAM 350 and 395 G)		
e. Audit plan and procedures? (FAM 210)		
2. If conditions changed during the course of the audit, were the audit strategy, audit plans, and procedures modified as appropriate in the circumstances, including evidence of first partner (audit director) approval? (FAM 210)		
3. Has the audit director determined that communications have occurred among the engagement team regarding fraud risks and error risks? (FAM 265 and FAM 290)		
4. When the auditor performed audit sampling, did the auditor properly determine and document the		
a. method used in relation to test objectives, such as statistical sampling (e.g., monetary unit sample or attribute sample) or nonstatistical sampling;		
b. sample size and method (e.g., IDEA) of determining the sample size;		
c. tests performed;		
d. results (misstatements and deviations found);		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
e. evaluation (including projection to the population if statistical sampling was used);		
f. conclusions; and		
g. requirements described in section III of this checklist with respect to consultation with the audit sampling specialist? (FAM 490)		
5. Did the auditor properly perform and document its substantive analytical procedures? (FAM 475 and 490)		
6. When the auditor performed interim testing, did the auditor		
a. test the roll-forward period and		
b. properly document the		
i. basis for using interim testing and the line items, accounts, note disclosures, classes of transactions, and assertions tested, as applicable,		
ii. procedures performed, and		
iii. effects of any misstatements found? (FAM 495 C)		
7. Did the auditor evaluate the reasonableness of significant accounting estimates made by management? (FAM 905)		
8. Did an IS controls auditor concur with the auditor's identification of IS controls that will be tested (including controls performed at service organizations used by the entity)? (FAM 350)		
9. For any identified budget controls, did the auditor perform sufficient work to support the conclusions on internal control? (FAM 250, 330, and 460)		
10. For any identified compliance controls, did the auditor perform sufficient work to support the conclusions on internal control? (FAM 245, 330, and 460)		
Based on the risk of material misstatement, did the auditor perform adequate substantive audit procedures for material line items, accounts, note disclosures, and classes of transactions for items 11 through 19? (If not a material area, enter N/A.)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
11. **Intragovernmental Activity and Balances (FAM 902)**		
Did the auditor do the following:		
a. Determine whether the entity resolved (i.e., reconciled and adjusted the accounting records resulting in the difference no longer existing) all material intragovernmental differences quarterly and, most importantly, at year-end?		
b. Assess (at absolute value) the materiality of unresolved differences at year-end?		
c. Determine (1) whether the entity reviewed journal vouchers that Treasury recorded to the entity's data in order to remove intragovernmental differences in preparing the prior-year U.S. government's consolidated financial statements; (2) why the entity did not resolve these differences (even though Treasury was able to reconcile and remove them); and (3) if appropriate, whether the entity fixed the causes of these differences so that they will not exist at the end of the current year?		
12. **Fund Balance with Treasury (FBWT) (FAM 921)** *Note: Although FBWT is intragovernmental, FBWT is separately addressed because of its significance.*		
a. Did the auditor determine if the entity		
i. properly and timely recorded and reported collection and disbursement activity in its FBWT accounts;		
ii. timely investigated FBWT balances recorded to clearing Treasury account symbols (TAS) and classified the balances to the proper TASs in the entity's general ledger and the Central Accounting Reporting System;		
iii. reconciled its FBWT account balance and activity periodically and at year-end;		
iv. appropriately recorded and reviewed any adjusting journal vouchers recorded to FBWT accounts;		
v. disclosed the status of accounts, such as open, expired, or cancelled, and whether each account is appropriately included in the FBWT line item; and		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
vi. disclosed in the notes to the financial statements (a) material unreconciled differences, (b) material unreconciled differences that were written off by the entity during the year, and (c) material restrictions?		
b. Did the auditor determine the materiality of gross unreconciled differences and clearing account balances by analyzing the aggregate absolute values and resulting effect on the financial statements?		
13. **Receivables** Consider these issues:		
a. Were receivables confirmed and appropriate follow-up steps taken, including second requests and subsequent collections (AU-C 505)?		
b. Are receivables stated at net realizable value after allowance for uncollectible accounts (AU-C 540)?		
14. **Valuation of Investments in Securities When Valuations Are Based on the Investee's Financial Results, Excluding Investments Accounted for Using the Equity Method of Accounting (AU-C 501)**		
a. When investments in securities are valued based on an investee's financial results, excluding investments accounted for using the equity method of accounting, did the auditor obtain sufficient appropriate audit evidence regarding the investee's financial results, including as applicable in the circumstances, performing the following procedures:		
i. Obtain and read available financial statements of the investee and the accompanying audit report, if any, including determining whether the report of the other auditor is satisfactory for this purpose?		
ii. If the investee's financial statements are not audited, or if the audit report on such financial statements is not satisfactory to the auditor, apply—or request that the investor entity arrange with the investee to have another auditor apply—appropriate auditing procedures to such financial statements, considering the materiality of the investment in relation to the financial statements of the investor entity?		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
iii. If the carrying amount of the investment reflects factors that are not recognized in the investee's financial statements or fair values of assets that are materially different from the investee's carrying amounts, obtain sufficient appropriate audit evidence regarding such amounts?		
iv. If the difference between the financial statement period of the entity and the investee has or could have a material effect on the entity's financial statements, determine whether the entity's management has properly considered the lack of comparability and determine the effect, if any, on the auditor's report?		
b. With respect to subsequent events and transactions of the investee occurring after the date of the investee's financial statements but before the date of the auditor's report, did the auditor obtain and read available interim financial statements of the investee and make appropriate inquiries of management of the investor to identify such events and transactions that may be material to the investor's financial statements and that may need to be recognized or disclosed in the investor's financial statements?		
15. **Inventories (AU-C 501)**		
a. Did the auditor consider the effects of SFFAS 48, Opening Balances for Inventory, Operating Materials and Supplies, and Stockpile Materials if applied by the entity? SFFAS 48 is intended to provide an alternative valuation method to adoption of U.S. GAAP when historical records and systems do not provide a basis for valuation of opening balances in accordance with SFFAS 3, Accounting for Inventory and Related Property.		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
b. Did the auditor obtain sufficient appropriate audit evidence regarding the existence and condition of inventory by i. attending physical inventory counting, unless impracticable, to • evaluate management's instructions and procedures for recording and controlling the results of the entity's physical inventory counting, • observe the performance of management's count procedures, • inspect the inventory, and • perform test counts? ii. performing audit procedures over the entity's final inventory records to determine whether they actually reflect actual inventory count results?		
c. If physical inventory counting was conducted at a date other than the date of the financial statements, did the auditor, in addition to the procedures required in b above, perform audit procedures to obtain audit evidence about whether changes in inventory between the count date and the date of the financial statements are recorded properly? (AU-C 501.13)		
d. If the auditor was unable to attend physical inventory counting due to unforeseen circumstances, did the auditor make or observe some physical counts on an alternative date and perform audit procedures on intervening transactions? (AU-C 501.14)		
e. If attending physical inventory counting was impracticable, did the auditor perform alternative audit procedures to obtain sufficient appropriate audit evidence regarding the existence and condition of inventory? If it was not possible to do so, did the auditor modify the opinion in the auditor's report, in accordance with AU-C 705? (AU-C 501.15)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
f. If inventory under the custody and control of a third party was material to the financial statements, did the auditor obtain sufficient appropriate audit evidence regarding the existence and condition of that inventory by performing one or both of the following: i. Request confirmation from the third party regarding the quantities and condition of inventory held on behalf of the entity? ii. Perform inspection or other audit procedures appropriate in the circumstances? (AU-C 501.16)		
16. **Property, Plant, and Equipment** Consider these issues:		
a. Was a summary schedule prepared (or obtained) to show beginning balances, changes during the period, and ending balances for		
i. property, plant, and equipment and		
ii. accumulated depreciation?		
b. Did the auditor consider the effects of SFFAS 50, Establishing Opening Balances for General Property, Plant, and Equipment, if applied by the entity? SFFAS 50 provides implementation guidance to allow a reporting entity, under specific conditions, to apply alternative methods in establishing opening balances for general property, plant, and equipment.		
c. Were significant activity and balances tested, particularly for existence and other significant assertions?		
d. Were property items capitalized or expensed in accordance with consistent capitalization limits?		
e. Did the auditor perform tests of completeness, such as testing from disbursements to property records?		
17. **Liabilities** Consider these issues:		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
a. Did the auditor perform an adequate search for unrecorded liabilities as close as possible to the opinion date?		
b. Did the auditor consider expenses that might require accrual (e.g., pensions, compensated absences, other postretirement benefits, or postemployment benefits provided to former or inactive employees prior to retirement) and whether accrued expenses were reasonably stated?		
18. **Revenue and Expenses** Consider these issues		
a. Did the auditor compare revenue and expenses for the period to expectations, based on the budget and the results of the preceding period?		
b. For significant variances and fluctuations from expectations, were management's explanations corroborated with other audit evidence, or if explanations could not be obtained, were other audit procedures performed to determine whether the variance is a misstatement?		
c. Did the auditor consider		
i. the entity's revenue recognition policy,		
ii. unusual transactions, and		
iii. fraud risks?		
19. **Statement of Budgetary Resources (SBR)** Consider these issues:		
a. Were appropriate procedures applied, such as		
i. understanding and testing the budget execution controls;		
ii. tests of the process of preparing the SBR and controls for ensuring validity of undelivered order (UDO) balances;		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
iii. tests of budgetary resources reported in the SBR, such as appropriations and recoveries from downward adjustments to prior-year UDOs, and including the consistency of recorded offsetting collections to related assets, liabilities, revenues, and expended and unexpended appropriation accounts;		
iv. tests of obligations incurred, and upward and downward adjustments to obligations, for the fiscal year;		
v. tests of UDO balances, as of the reporting date;		
vi. tests of budgetary balances for ending obligations, such as delivered orders unpaid, delivered orders paid, and unobligated balances, among others, to related components of the FBWT account for consistency; and		
vii. review of the reconciliation of the prior-year SBR to the President's Budget?		
20. Did the auditor identify and determine whether the entity implemented relevant control activities that relate to services provided by a service organization(s), including those that are applied to transactions processed by the service organization? (FAM 640)		
21. Does the documentation indicate that the auditor properly performed procedures in the reporting phase of the audit (FAM 590) as follows:		
a. Perform overall analytical procedures? (FAM 520)		
b. Reassess materiality and risks of material misstatement? (FAM 530)		
c. Evaluate the effects of both uncorrected and corrected misstatements on the financial statements and notes? (FAM 540)		
d. Document all misstatements accumulated during the audit (other than clearly trivial ones) and identify those that were not corrected? (FAM 540)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
e. Classify the uncorrected misstatements identified in step d above as either factual, judgmental, or projected on the list of adjusting entries needed to correct the uncorrected misstatements (FAM 540 and FAM 595 C) and bring them to the attention of management and those charged with governance? (FAM 540 and FAM 550)		
f. Evaluate audit exposure, including uncorrected misstatements, possible undetected misstatements (e.g., untested amounts and audit precision), and qualitative considerations, and determine the effect on the financial statements and notes? (FAM 545)		
g. Directly obtain the legal counsel response? (FAM 550 and FAM 1002)		
h. Perform procedures to identify material subsequent events? (FAM 550 and FAM 1005)		
i. Obtain management representations? (FAM 550 and FAM 1001)		
j. Identify and evaluate relationships and transactions with related parties, disclosure entities, and public-private partnerships? (FAM 550 and FAM 904)		
k. Communicate with those charged with governance? (FAM 550)		
l. Assess and conclude on procedures performed for RSI, including Management's Discussion and Analysis (MD&A), and other information in the entity's annual report (e.g., performance and accountability report or agency financial report)? (FAM 550)		
22. Did the auditor evaluate the severity of each internal control deficiency identified and determine whether the deficiency, individually or in combination with others, is a material weakness or a significant deficiency? (FAM 580)		
23. Does the **audit summary memorandum** or equivalent properly summarize or refer to documentation addressing the following (FAM 590)? *Note: If the situation or issue did not occur, answer N/A.*		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
a. Any significant changes from the auditor's original assessment of materiality for the financial statements as a whole and the risks of material misstatement at the financial statement and assertion levels.		
b. Any additional fraud risks or other conditions beyond those considered in planning (FAM 265), including analytical relationships identified during the audit that caused the auditor to believe that additional audit procedures or any other response was required, as well as any further response that the auditor concluded was appropriate.		
c. The results of the procedures performed to specifically address the risk of management override of controls, including the consideration of the qualitative aspects of the entity's accounting practices, including indicators of possible bias in management's judgments.		
d. The work performed that demonstrates that information in the financial statements agrees or reconciles with the underlying accounting records, including agreeing or reconciling note disclosures, whether such information is obtained from within or outside of the general and subsidiary ledgers.		
e. The auditor's evaluation of misstatements that the auditor believes are or might be the result of fraud.		
f. The nature of any communications about fraud or possible fraud (and any significant abuse) made to management, those charged with governance, the Special Investigator Unit, the office of inspector general, or others.		
g. The auditor's summary conclusions related to the consideration of fraud.		
h. Significant findings or issues (accounting, auditing, or reporting), the conclusions reached thereon, and significant judgments made in reaching those conclusions.		
i. If the auditor identified information that is inconsistent with the auditor's final conclusion regarding a significant finding or issue, how the auditor addressed the inconsistencies.		
j. Any limitations on the audit scope.		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
k. The auditor's conclusions, at the financial statement and assertion levels, on whether the audit evidence obtained is sufficient and appropriate, and supports the auditor's reports on the financial statements; RSI (including MD&A), and other information included in the annual report; internal control over financial reporting; whether financial management systems comply substantially with the three FFMIA requirements (for CFO Act agencies); and compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements.		
l. The auditor's conclusions on whether sufficient appropriate audit evidence was obtained to reduce audit risk to an appropriately low level.		
m. The auditor's conclusion on whether the audit was performed in accordance with GAGAS; OMB audit guidance, if applicable; and the FAM, and whether the report is appropriate.		
n. The auditor's conclusion on whether the entity's financial statements are in accordance with U.S. GAAP.		
o. The auditor's evaluation of the consistency of the financial statements between periods and how the auditor addressed any material inconsistencies identified.		
p. Significant subsequent events, if any.		
q. Findings with respect to transactions with disclosure entities, related parties, and public-private partnerships and complex or unusual transactions.		
r. The summary of uncorrected misstatements; summary of corrected misstatements; communication of the misstatements to management and those charged with governance; the auditor's conclusion about whether uncorrected misstatements are material, individually or in the aggregate; and the basis for that conclusion.		
s. A summary of internal control deficiencies classified as material weaknesses, significant deficiencies, or other control deficiencies, and a comparison of material weaknesses the auditor found to those reported in management's assessment about the effectiveness of internal control.		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
t. A summary of instances in which the entity's financial management systems do not comply substantially with FFMIA requirements, as well as areas in which there is substantial but not full compliance (for CFO Act agencies).		
u. A summary of instances of noncompliance with significant provisions of applicable laws, regulations, contracts, and grant agreements.		
v. Documentation of overall analytical procedures.		
w. Documentation of required oral or written communication with management, those charged with governance, and others, including the nature of the significant findings or issues discussed, and when and with whom the discussions took place.		
x. A copy or summary of management's communications provided to those charged with governance if, as part of its communication to those charged with governance, management communicated some or all of the matters the auditor is required to communicate, and as a result, the auditor did not communicate these matters at the same level of detail as management.		
y. The auditor's conclusion on the adequacy of two-way communication with those charged with governance.		
z. Any departures from the applicable "should" procedures in the FAM and the basis for them, including the audit director's approval and a statement about whether the engagement team provided supporting documentation to the reviewer in a timely manner to allow any issues to be promptly identified and resolved.		
24. In addition to the questions above, determine whether the following objectives were achieved (AU-C 200.23).		
a. Did the auditor • obtain sufficient appropriate audit evidence regarding the risks of material misstatement due to fraud, through designing and implementing appropriate responses, and • respond appropriately to fraud or suspected fraud identified during the audit? (AU-C 240)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
b. Did the auditor • obtain sufficient appropriate audit evidence regarding material amounts and disclosures in the financial statements that are determined by the provisions of those laws and regulations generally recognized to have a direct effect on their determination? • perform specified audit procedures that may identify instances of noncompliance with provisions of other laws and regulations that may have a material effect on the financial statements? • respond appropriately to noncompliance or suspected noncompliance with provisions of laws and regulations identified during the audit? (AU-C 250)		
c. In addition to the AICPA requirements (AU-C 250) concerning fraud and noncompliance with provisions of applicable laws and regulations, when performing a GAGAS financial audit, did the auditor extend the AICPA requirements pertaining to the auditor's responsibilities for laws and regulations to also apply to consideration of compliance with provisions of contracts or grant agreements? (GAGAS (2018) 6.15)		
d. Did the auditor obtain sufficient appropriate audit evidence regarding the risks of material misstatement through designing and implementing appropriate responses to those risks? (AU-C 330)		
e. When the entity used the services of a service organization, did the auditor design and perform audit procedures responsive to those risks? (AU-C 402)		
f. Did the auditor evaluate the effect of (a) identified misstatements on the audit and (b) uncorrected misstatements, if any, on the financial statements, including note disclosures? (AU-C 450.03a and .03b)		
g. Did the auditor design and perform audit procedures that enable the auditor to obtain sufficient appropriate audit evidence to be able to draw reasonable conclusions on which to base the auditor's opinion? (AU-C 500)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
h. Did the auditor obtain sufficient and appropriate audit evidence regarding the • valuation of investments in securities and derivative instruments; • existence and condition of inventory; • completeness of litigation, claims, and assessments involving the entity; • presentation and disclosure of segment information, in accordance with the applicable financial reporting framework (generally U.S. GAAP); and • work of management's specialists? (AU-C 501)		
i. Did the auditor, when using external confirmation procedures, design and perform such procedures to obtain relevant and reliable audit evidence?		
j. Did the auditor, in conducting an initial audit engagement, including a reaudit engagement (an initial audit engagement to audit financial statements that have been previously audited by a predecessor auditor), obtain sufficient appropriate audit evidence regarding opening balances about whether • opening balances contain misstatements that materially affect the current period's financial statements and • appropriate accounting policies reflected in the opening balances have been consistently applied in the current period's financial statements, or changes thereto are appropriately accounted for and adequately presented and disclosed in accordance with the applicable financial reporting framework (generally U.S. GAAP)? (AU-C 510)		
k. Did the auditor • obtain relevant and reliable audit evidence when using substantive analytical procedures and • design and perform analytical procedures near the end of the audit that assist the auditor when forming an overall conclusion about whether the financial statements are consistent with the auditor's understanding of the entity? (AU-C 520)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
l. Did the auditor, when using audit sampling, provide a reasonable basis for the auditor to draw conclusions about the population from which the sample is selected? (AU-C 530)		
m. Did the auditor obtain sufficient appropriate audit evidence about whether accounting estimates and related note disclosures in the financial statements are reasonable, in the context of the applicable financial reporting framework (generally U.S. GAAP) (AU-C 540)		
n. Did the auditor do the following: • Obtain an understanding of relationships and transactions with disclosure entities, related parties, and public-private partnerships sufficient to be able to ○ recognize fraud risk factors, if any, arising from such relationships and transactions that are relevant to identifying and assessing the risks of material misstatement due to fraud and ○ conclude, based on the audit evidence obtained, whether the financial statements, insofar as they are affected by those relationships and transactions, achieve fair presentation? • Obtain sufficient appropriate audit evidence about whether relationships and transactions with disclosure entities, related parties, and public-private partnerships have been appropriately identified, accounted for, and disclosed in the financial statements? (AU-C 550)		
o. Did the auditor obtain sufficient appropriate audit evidence about whether events occurring between the date of the financial statements and the date of the auditor's report that require adjustment of, or disclosure in, the financial statements are appropriately reflected in those financial statements in accordance with the applicable financial reporting framework (generally U.S. GAAP)? (AU-C 560)		
p. Did the auditor respond appropriately to facts that became known to the auditor after the date of the prior-year auditor's report that, had they been known to the auditor at that date, may have caused the auditor to revise the prior-year auditor's report? (AU-C 560)		

Section II: Performing the Engagement	Yes, No,* N/A	Doc. ref.
q. If the auditor is a predecessor auditor who is requested to reissue a previously issued auditor's report on financial statements that are to be presented on a comparative basis with audited financial statements of a subsequent period, did the auditor perform specified procedures to determine whether the previously issued auditor's report is still appropriate before such report is reissued? (AU-C 560)		
r. For entities that conform to FASB standards, did the auditor • evaluate and conclude, based on the audit evidence obtained, whether there is substantial doubt about the entity's ability to continue as a going concern for a reasonable period of time; • assess the possible financial statement effects, including the adequacy of disclosure regarding uncertainties about the entity's ability to continue as a going concern for a reasonable period of time; and • determine the implications for the auditor's report? (AU-C 570)		
s. Did the auditor • obtain written representations from management and, when appropriate, those charged with governance that they believe that they have fulfilled their responsibilities for the preparation and fair presentation of the financial statements and for the completeness of the information provided to the auditor; • support other audit evidence relevant to the financial statements or specific assertions in the financial statements through written representations if determined necessary by the auditor or required by other AU-C sections; and • respond appropriately if the auditor has doubts about the reliability of the written representations provided or if the requested written representations were not provided? (AU-C 580)		
t. Did the auditor assess the effect of omitted procedures of which the auditor becomes aware on the auditor's present ability to support the previously expressed opinion on the financial statements and respond appropriately? (AU-C 585)		

Section III: Communicating with Auditor's Specialists and Reviewer

Section III: Communicating with Auditor's Specialists and Reviewer	Yes, No,* N/A	Doc. ref.
1. If expertise in a field other than accounting or auditing is necessary to obtain sufficient appropriate audit evidence, did the auditor use the work of an auditor's specialist (e.g., audit sampling specialist, IT specialist, actuary, statistician, economist, or legal counsel)? (FAM 620)		
2. Did the auditor consult with the audit sampling specialist in performing the following:		
a. If complex statistical concepts are applied, designing and evaluating audit samples? (FAM 400)		
b. Determining overall sampling precision for statistical samples selected using methods other than monetary unit sampling? (FAM 545)		
c. Expanding a statistical sample to test additional items? (FAM 440, 460, and 480)		
d. Deciding to perform nonstatistical sampling? (FAM 480) *Note: Nonstatistical sampling is different from nonstatistical selection. The auditor does <u>not</u> need to consult the audit sampling specialist when performing nonstatistical selection.*		
e. Using regression analysis for analytical procedures? (FAM 495 A)		
3. When applicable, did the engagement team consult with the Office of General Counsel (OGC) when taking the following steps:		
a. Identifying provisions of laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements? (FAM 245)		
b. Identifying relevant budget restrictions? (FAM 250)		
c. Identifying any impoundments (rescissions or deferrals) as a result of evaluating budgetary controls? (FAM 395 F)		
d. Evaluating possible instances of noncompliance noted in connection with compliance testing (including testing of contracts and grant agreements)? (FAM 460)		

Section III: Communicating with Auditor's Specialists and Reviewer	Yes, No,* N/A	Doc. ref.
e. After consulting with the audit director, determining that a misstatement is or might be a result of fraud? (FAM 540)		
f. Concluding on any noncompliance with significant provisions of applicable laws and regulations? (FAM 580)		
g. Concluding whether the entity's financial management systems comply substantially with the requirements of FFMIA? (FAM 580)		
h. Determining the effects on the auditor's report if weaknesses are found in compliance controls but no instances of noncompliance are detected? (FAM 580)		
4. When applicable, did the engagement team provide the reviewer with documentation related to the following in a timely manner to allow any issues to be promptly identified and resolved:		
a. Using nonstatistical sampling? (This is not the same as nonstatistical selection, which is not intended to be representative of the population.) (FAM 480)		
b. Determining the adequacy of substantive procedures in light of any reassessment of risk of material misstatement? (FAM 530)		
c. Determining the need to perform additional procedures when there are questions about the adequacy of work performed? (FAM 530)		
d. Evaluating audit exposure, including uncorrected misstatements, possible undetected misstatements (e.g., untested amounts and audit precision), and qualitative considerations, and determining its effect on the financial statements and notes? (FAM 545)		
e. Determining the effects on the auditor's report, current-period financial statements, and prior-period financial statements of any other than clearly trivial misstatements detected in the current period that arose during prior periods but were not detected during prior audits? (FAM 540)		
f. Deciding to perform additional procedures to increase assurance of any projected misstatements? (FAM 440 and 480)		

Section III: Communicating with Auditor's Specialists and Reviewer	Yes, No,* N/A	Doc. ref.
g. The engagement team believes a misstatement may be the result of fraud? (FAM 540)		
h. Deciding to include a discussion of fraud in the audit report that involves senior management or that causes a material misstatement of the financial statements? (FAM 540)		
i. Concluding on whether the financial statements are materially affected by a departure from U.S. GAAP? (FAM 580)		
j. Determining the appropriate type of opinion on internal control when there is a scope limitation? (FAM 580)		
k. Determining the effects on the auditor's report if weaknesses are found in compliance controls but no instances of noncompliance are detected? (FAM 580)		
l. Departing from the applicable "should" procedures in the FAM and documenting the basis for the departure?		
5. In addition to the questions above, answer the following regarding whether the auditor achieved the following objectives (AU-C 200.23).		
Did the auditor • determine whether to use the work of an auditor's specialist and • if using the work of an auditor's specialist, determine whether that work is adequate for the auditor's purposes? (AU-C 620)		

Section IV: Communicating and Reporting Results

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
1. Is the auditor's report appropriate as to the following (FAM 580):		
a. Format, including section titles and organization?		
b. Opinion and basis for opinion, or disclaimer and basis for disclaimer, on the financial statements?		
c. Opinion and basis for opinion on internal control over financial reporting, or results of consideration of internal control over financial reporting and basis for those results?		
d. Management's responsibilities?		
e. Auditor's responsibilities?		
f. Definition and inherent limitations of internal control over financial reporting		
g. Reporting on RSI and other information?		
h. Reporting on compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements?		
i. Conclusions on whether the entity's financial management systems comply substantially with the requirements of FFMIA (for CFO Act agencies)?		
j. Emphasis-of-matter and other-matter paragraphs, as applicable?		
2. Is background material (purpose, authority, and functions of programs or activities) limited to what is necessary?		
3. Were the auditor's report and the management representation letter dated when all appropriate, sufficient audit evidence is obtained to support the opinion and all significant issues have been resolved? (FAM 550 and FAM 580)		
4. If the financial statements of a prior period are presented and have been audited by a predecessor auditor whose report is not presented, does the auditor's report refer to the predecessor auditor's report? (FAM 580)		

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
5. When illegal acts occurred involving funds received from other governmental entities, did the auditor		
a. satisfy itself that the audited entity notified the proper officials of those entities within a reasonable time and		
b. report these acts to the officials of those other governmental entities if the entity did not, or was unable to do so because the top official was involved? (GAGAS (2018) 6.53)		
6. Does the auditor's report include		
a. identification of significant deficiencies and material weaknesses (GAGAS (2018) 6.40);		
b. [for audits where no opinion on internal control over financial reporting is expressed] a statement that the auditor did not identify any deficiencies in internal control over financial reporting that were considered to be material weaknesses, if such were true (OMB audit guidance); and		
c. presentation of all identified (1) instances of fraud and illegal acts that are more than inconsequential and (2) material violations of provisions of contracts or grant agreements? (GAGAS (2018) 6.41)		
7. When appropriate, did the auditor report directly to outside parties on fraud, illegal acts, or violations of provisions of contracts or grant agreements? (GAGAS (2018) 6.53)		
8. Did the auditor consider the status of all known significant findings and recommendations from prior audits that affect the current-year report, including whether any failure to correct previously identified deficiencies in internal control is a significant deficiency or material weakness? (GAGAS (2018) 6.11)		
9. Did the auditor document the basis to support the (FAM 590)		
a. opinion about whether the financial statements are presented fairly, in all material respects, in accordance with U.S. GAAP;		
b. opinion or conclusion on internal control;		
c. conclusion on whether the entity's financial management systems comply substantially with the requirements of FFMIA		

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
(for CFO Act agencies); and		
d. conclusion on compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements?		
10. Did the auditor document the basis for reported findings on		
a. internal control deficiencies, including classification of control deficiencies as material weaknesses, significant deficiencies, or other control deficiencies (FAM 590);		
b. the entity's financial management systems not complying substantially with the requirements of FFMIA (for CFO Act agencies) (FAM 590); and		
c. noncompliance with significant provisions of applicable laws, regulations, contracts, and grant agreements (FAM 590), if any?		
11. Did the auditor develop the elements of audit findings to include (where appropriate and known) the		
a. condition (describe the existing situation),		
b. criteria (state what we are comparing to),		
c. cause (reflect reason or reasons why the condition and criteria differ), and		
d. effect (describe the result of the difference between the condition and criteria)? (FAM 580 and GAGAS (2018) 6.25 through 6.28)		
12. Are recommendations and suggestions (if any) reasonable, doable, and cost-effective?		
13. In addition to the questions above, determine whether the following objectives were achieved. (AU-C 200.23)		
a. Did the auditor • provide those charged with governance with timely observations arising from the audit that are significant and relevant to their responsibility to oversee the financial reporting process and • promote effective two-way communication between the		

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
auditor and those charged with governance? (AU-C 260)		
b. Did the auditor appropriately communicate to those charged with governance, management, and others, as appropriate, significant findings and issues and internal control deficiencies that, in the auditor's professional judgment, are of sufficient importance to merit their respective attentions (e.g., material weaknesses, significant deficiencies, and any other identified deficiencies in internal control)? (AU-C 265)		
c. If the auditor decides to act as the auditor of the group financial statements, did the auditor • determine whether to make reference to the audit of a component auditor in the auditor's report on the group financial statements; • communicate clearly with component auditors; and • obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion about whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework (generally U.S. GAAP)? (AU-C 600A)		
d. Did the auditor • form an opinion on the financial statements based on an evaluation of the audit evidence obtained, including evidence obtained about comparative financial statements or comparative financial information, and • express clearly that opinion on the financial statements through a written report that also describes the basis for that opinion? (AU-C 700)		
e. Did the auditor express clearly an appropriately modified opinion on the financial statements that is necessary when • the auditor concludes, based on the audit evidence obtained, that the financial statements as a whole are materially misstated or • the auditor is unable to obtain sufficient appropriate audit evidence to conclude that the financial statements as a whole are free from material misstatement? (AU-C 705)		
f. Did the auditor, having formed an opinion on the financial statements, draw users' attention—when in the auditor's		

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
judgment it is necessary to do so, by way of clear additional communication in the auditor's report—to • a matter, although appropriately presented or disclosed in the financial statements, that is of such importance that it is fundamental to users' understanding of the financial statements or • as appropriate, any other matter that is relevant to users' understanding of the audit, the auditor's responsibilities, or the auditor's report? (AU-C 706)		
g. Did the auditor • evaluate the consistency of the financial statements between periods[20] and • communicate appropriately in the auditor's report when the comparability of financial statements between periods has been materially affected by a change in accounting principle or by adjustments to correct a material misstatement in previously issued financial statements? (Based on AU-C 708)		
h. Did the auditor respond appropriately when the auditor became aware that the entity's annual report included other information that could undermine the credibility of those financial statements and the auditor's report? (AU-C 720)		
i. When providing an opinion or a disclaimer on financial statements, did the auditor also report on internal control over financial reporting and on compliance with selected provisions of applicable laws, regulations, contracts, or grant agreements that have a material effect on the financial statements? Did the auditor report on internal control and compliance, regardless of whether the auditor identified internal control deficiencies or instances of noncompliance? (GAGAS (2018) 6.39 and 6.40)		

[20]When the auditor's opinion covers only the current period, the auditor should evaluate the consistency of the current-period financial statements with those of the preceding period. When the auditor's opinion covers two or more periods, the auditor should evaluate the consistency between such periods and the consistency of the earliest period covered by the auditor's opinion with the period preceding it. The auditor should also evaluate whether the financial statements for the prior periods being reported upon are consistent with previously issued financial statements for those periods.

Section IV: Communicating and Reporting Results	Yes, No,* N/A	Doc. ref.
j. When a designated accounting standards setter required information to accompany an entity's financial statements, did the auditor perform specified procedures in order to • describe, in the auditor's report, whether required supplementary information is presented and • communicate when some or all of the required supplementary information has not been presented in accordance with guidelines that a designated accounting standards setter established or when the auditor has identified material modifications that should be made to the RSI for it to be in accordance with the standards setter's guidelines? (AU-C 730)		
k. Did the auditor restrict the use of the auditor's written communication by including an alert when the potential exists for such written communication to be misunderstood if taken out of the context in which it is intended to be used (e.g., restricted use of report on compliance with laws, regulations, contracts, and grant agreements)? (AU-C 905)		

Section V: GAO's Quality Control (GAO Only)

(See Financial Audit Practice (FP) Memo 1, *Quality Control for Financial Statement Audits Performed by GAO*, and FP Memo 6, *Supplemental Financial Audit Manual Guidance Applicable Only to GAO Engagements*, for details.)

Section V: GAO's Quality Control (GAO Only)	Yes, No,* N/A	Doc. ref.
1. Was the draft audit report reviewed by the		
a. assistant director,		
b. audit director (first/engagement partner),		
c. OGC (Form 124A),		
d. other stakeholders (Form 124C), and		
e. reviewer (second partner)?		
2. Did the audit director (first/engagement partner) review the		
a. audit strategy, including audit sampling approach (FAM 290);		
b. LIRA forms that contain high or moderate risk(s) of material misstatement at the assertion level (i.e., combined inherent risk and control risk) or significant risk(s) (FAM 290);		
c. cycle summary memos for cycles that contain high or moderate risk(s) of material misstatement at the assertion level or significant risk(s) (FAM 490);		
d. audit summary memorandum (FAM 590);		
e. management representation letter (FAM 1001);		
f. legal counsel response (FAM 1002);		
g. summary of uncorrected misstatements (FAM 595 C);		
h. entity financial statements and notes;		
i. exit conference memorandum (FAM 590); and		
j. memorandum(s) on significant accounting, auditing, and reporting issues (FAM 590)?		
3. Did the assistant director review the		

Section V: GAO's Quality Control (GAO Only)	Yes, No,* N/A	Doc. ref.
a. entity profile (FAM 290);		
b. audit strategy, including audit sampling approach (FAM 290);		
c. LIRA forms (FAM 290);		
d. initial audit plan with procedures (FAM 290);		
e. line item/account lead schedules;		
f. completed audit plan with procedures (FAM 290);		
g. SCE worksheets (FAM 390);		
h. cycle summary memos (FAM 490);		
i. audit summary memorandum (FAM 590);		
j. documentation used to evaluate whether the financial statements are presented in accordance with U.S. GAAP (e.g., Federal Financial Reporting Checklist for statements using U.S. GAAP promulgated by FASAB,[21] financial reporting and disclosure checklist for statements using U.S. GAAP promulgated by Financial Accounting Standards Board, or an equivalent U.S. GAAP checklist);		
k. management representation letter (FAM 1001);		
l. legal counsel response (FAM 1002);		
m. summary of uncorrected misstatements (FAM 595 C);		
n. exit conference memorandum (FAM 590); and		
o. entity financial statements and notes; and		
p. memorandum(s) on significant accounting, auditing, and reporting issues (FAM 590)?		
4. Did the assistant director determine that all significant review notes were resolved appropriately?		

[21]Auditors may obtain the Federal Financial Reporting Checklist (FAM volume 3) at https://www.gao.gov/financial-audit-manual (accessed June 4, 2026).

Section V: GAO's Quality Control (GAO Only)	Yes, No,* N/A	Doc. ref.
5. Did the assistant director indicate that all documentation was sufficiently reviewed by the auditor's report date (FAM 580), including any required secondary reviews? *Note: There may be instances where the audit documentation is not completely organized by the auditor's report date. However, the auditor's review date represents when the audit evidence has been obtained, discussed, and agreed to by relevant members of the engagement team. Certain documentation, such as agency comments on a draft report or procedures related to subsequently discovered facts, cannot be reviewed until after the auditor's report date.*		
6. Were review responsibilities documented and communicated to all individuals on the engagement?		
7. Did the audit director determine that the work performed by the IS controls auditor is sufficient and appropriate for meeting the audit objectives?		
8. Was any documentation prepared by an IS controls auditor reviewed by an individual with sufficient technical knowledge to determine whether the work was properly performed and the conclusions reached are reasonable and supported?		
9. For (a) financial statement level risks and (b) significant risks at the assertion level, did the audit director or assistant director perform secondary review of the audit documentation detailing the auditor's response to those risks?		
10. Was all documentation prepared by the audit director or assistant directors read by the auditor-in-charge to determine its consistency with any related documentation?		
11. If the documentation indicated a difference of opinion between engagement personnel or between engagement personnel and a specialist or other person consulted, was the difference resolved appropriately and was the basis of the resolution documented?		
12. In addition to the questions above, determine whether the following objectives were achieved. (AU-C 200.23)		

Section V: GAO's Quality Control (GAO Only)	Yes, No,* N/A	Doc. ref.
a. Did the auditor, in conducting an audit of financial statements, • obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, thereby enabling the auditor to express an opinion on whether the financial statements are presented fairly, in all material respects, in accordance with an applicable financial reporting framework (generally U.S. GAAP), and • report on the financial statements, and communicate as required by GAGAS, in accordance with the auditor's findings? (AU-C 200)		
b. In all cases when reasonable assurance cannot be obtained and a qualified opinion in the auditor's report is insufficient in the circumstances for reporting to the intended users of the financial statements, did the auditor disclaim an opinion? (AU-C 200)		
c. Did the auditor implement quality control procedures at the engagement level that provide the auditor with reasonable assurance that • the audit complies with professional standards and applicable legal and regulatory requirements and • the auditor's report issued is appropriate in the circumstances? (AU-C 220A)		
d. Did the auditor prepare documentation that provides • a sufficient and appropriate record of the basis for the auditor's report and • evidence that the audit was planned and performed in accordance with GAGAS and applicable legal and regulatory requirements? (AU-C 230 and GAGAS (2018) 6.31 and 6.32)		

Section VI: Explanation of "No" Answers and Other Comments

Section VI: Explanation of "No" Answers and Other Comments			
This section is provided for the auditor to explain all "no" answers and to expand on any "yes" or "N/A" answers, as needed. It may be modified as necessary. For some questions, "no" answers may indicate departures from professional standards or auditor policies. The auditor should explain all "no" answers below and determine their effects and significance, including any effect on the auditor's report.			
Page no.	**Question no.**	**Explanation/Comments**	**Conclusion**

Section VII: Conclusions

Section VII: Conclusions	Yes	No*
Based on your review and knowledge, are the following statements correct?		
1. The engagement team planned and performed the engagement, in all material respects, in accordance with GAGAS (which includes U.S. GAAS) and OMB audit guidance, or if not, the auditor's report was appropriately modified.		
2. The financial statements conformed, in all material respects, with U.S. GAAP, or if not, the auditor's report was appropriately modified.		
3. The auditor's report was appropriate in the circumstances.		
4. The documentation on this engagement supports the auditor's • opinion on the financial statements; • opinion or conclusions on internal control; • conclusions on whether the entity's financial management systems comply substantially with the requirements of FFMIA (for CFO Act agencies); and • conclusions on compliance with significant provisions of applicable laws, regulations, contracts, and grant agreements.		
5. The engagement team complied, in all material respects, with the audit organization's policies and procedures.		

*If the response to any of the five statements above is "no," describe the response in a memorandum to the reviewer.

Auditor's report date _____

Auditor-in-Charge _____ Date _____

Assistant Director _____ Date _____

Audit Director _____ Date _____

Section VIII: Procedures Before Report Release Date

Section VIII: Procedures Before Report Release Date	Yes	No
1. Did the auditor respond appropriately to facts that became known to the auditor after the date of the auditor's report that, had they been known to the auditor at that date, may have caused the auditor to revise the auditor's report? (AU-C 560)		
2. Did the auditor obtain and appropriately report the views of responsible officials in the agency comments section of the auditor's report, including		
a. either oral or written comments;		
b. accurate characterization of general agreement or disagreement with the report;		
c. description of the substance of the comments; and		
d. auditor evaluation of the comments, particularly if comments disagree, are inconsistent, or conflict with the report findings, conclusions, or recommendations? (GAGAS (2018) 6.57 through 6.62)		
3. Did the auditor verify that the entity financial statements and notes did not change between the auditor's report date and the report release date?		
4. (GAO only) Did the assistant director and audit director review the final audit report and transmittal letter?		
Explanation of any "no" answers in this section or other comments:		

Report release date _____

Auditor-in-Charge _____ Date _____

Assistant Director _____ Date _____

Audit Director _____ Date _____

Section IX: Engagement Quality Control Review (Second Partner)

Section IX: Engagement Quality Control Review (Second Partner)

Objective: To evaluate the engagement team's judgments and the conclusions reached in formulating the auditor's report objectively.

Procedures: My evaluation, including that required for documenting the engagement quality control review, involved the following:

1. Discussing significant auditing, accounting, and reporting findings or issues with the audit director (first/engagement partner).

2. Reading the financial report, including the financial statements, notes, RSI, and other information and the proposed audit report.

3. Reviewing selected documentation relating to the significant judgments and key decisions of the engagement team and the related conclusions it reached, including, as appropriate, reviewing selected documentation consisting of

    a. the audit summary memorandum, which contains the conclusions reached in formulating the auditor's report and other selected documentation as appropriate;

    b. the summary of uncorrected misstatements; and

    c. consultations with audit sampling specialists, information technology specialists, and others.

4. Confirming with the audit director (first/engagement partner) that there are no unresolved issues.

Conclusion: Based on all the relevant facts of which I have knowledge, I found no matters, other than those that may be discussed in the auditor's report, that cause me to believe that (1) the audit was not performed in accordance with GAGAS; (2) the financial statements are not, in all material respects, in conformity with U.S. GAAP; and (3) the report is not in accordance with professional standards and the auditor's policies. Also, I am unaware of any unresolved matters that cause me to believe that the significant judgments of the engagement team and the conclusions it reached were not appropriate.

In signing this form, I acknowledge that there have been no personal or external impairments to independence regarding my work on this engagement.

_____

Engagement quality control reviewer name and title Signature Date

1005 – Subsequent Events Review

.01 This section discusses the subsequent events review that the auditor **should** perform as part of the audit, as described in FAM 550. AU-C 560, *Subsequent Events and Subsequently Discovered Facts,* describes and provides guidance on the types of subsequent events that the auditor should evaluate as well as the procedures that the auditor should perform to discover whether such events have occurred. The auditor should perform audit procedures designed to obtain sufficient appropriate audit evidence that all subsequent events that require adjustment of, or disclosure in, the financial statements have been identified. The auditor is not, however, expected to perform additional audit procedures on matters to which previously applied audit procedures have provided satisfactory conclusions (AU-C 560.09).

.02 Subsequent events are those events or transactions that affect the financial statements, notes, or RSI that may occur or become known between the date of the financial statements and the date of the auditor's report.

.03 Two types of subsequent events may occur:

- **Recognized events:** Subsequent events that provide additional evidence with respect to conditions that existed at the date of the financial statements and affect the estimates inherent in the process of preparing the financial statements, notes, and RSI. For example, a subsequent event may reveal that an accounting estimate is materially incorrect and that the auditor should ask management to adjust the financial statements for the effect of the event.
- **Nonrecognized events:** Subsequent events that provide evidence with respect to conditions that did not exist at the date of the financial statements but arose subsequent to that date. For example, a fire or flood after year-end may cause a significant loss (SFFAS 39).

.04 The purpose of a subsequent events review is to determine whether all subsequent events that have a material effect on the financial statements have been considered and treated appropriately in the financial statements. The subsequent period covered is from the date of the financial statements to the date of the auditor's report.

.05 In addition, close to but prior to the report release date, the auditor may inquire of management to determine if it is aware of any subsequently discovered facts that could materially affect the financial statements (see FAM 550.06). If management revises the financial statements for subsequently discovered facts after the original date of the auditor's report, see AU-C 560.13 for further guidance.

Audit Procedures

.06 At or near the completion of the audit, the auditor should perform procedures to be aware of any subsequent events that the auditor may ask management to adjust or disclose in the financial statements. These procedures are in addition to substantive tests that the auditor may apply to transactions occurring after the date of the financial statements, such as examining subsequent disbursements to test completeness of accounts payable.

.07 The following program describes audit procedures that the auditor should perform as part of a subsequent events review. The auditor should customize the procedures for the particular entity and should take into account the auditor's risk assessment in determining the nature and extent of such audit procedures (AU-C 560.10).

Entity _____

Period of financial statements _____

Job code _____

Subsequent Events Review – Audit Procedures	Initials and date	Doc. ref.
I. Management's procedures 1) Obtain an understanding of any procedures that management has established to ensure that subsequent events are identified (AU-C 560.10a). See SFFAS 39 for management's responsibilities.		
II. Read latest subsequent interim financial statements (AU-C 560.10d) 1) Compare the latest available interim financial statements, if any, with the financial statements under audit to identify any unusual adjustments and investigate any significant variations from expectations. 2) Inquire as to whether the interim statements have been prepared on the same basis as the annual statements. 3) Compare items in the statement of net costs to similar interim financial statements of the prior year; determine expectations and investigate any significant variations from expectations. 4) If interim financial statements are not available: a) Compare interim internal financial reports or analyses, budgets, or cash flow forecasts, considering any adjustments to the internal reports that may be necessary to make meaningful comparisons. b) Review the accounting records prepared since the date of the financial statements for material transactions that may require adjustment to or disclosure in the financial statements. For example, scan the general ledger and/or journals, or both for material, unusual entries.		

Subsequent Events Review – Audit Procedures	Initials and date	Doc. ref.
III. Inquire of management Based on AU-C 560.10b and .A6, inquire of management and, when appropriate, those charged with governance, whether any subsequent events have occurred that might materially affect the financial statements. Inquiries may include the following: 1) whether new commitments, borrowings, or guarantees have been entered into 2) whether any significant changes occurred in the financial condition of the entity or in net position or long-term debt 3) whether there are any items in the financial statements that were accounted for on the basis of preliminary or inconclusive data and the current status of such items 4) whether any significant changes in estimates were made with respect to amounts included or disclosed in the financial statements, or any significant changes in assumptions or factors were considered in determining estimates 5) whether any unusual accounting adjustments have been made or are contemplated 6) whether there have been any developments regarding contingencies, including those related to litigation, claims, and assessments 7) whether any significant acquisitions or disposals of assets have occurred or are planned 8) whether any events have occurred or are likely to occur that will bring into question the appropriateness of accounting policies used in the financial statements 9) whether any events have occurred that are relevant to the measurement of estimates or provisions made in the financial statements 10) whether any events have occurred that are relevant to the recoverability of assets (e.g., impairment of property, plant, and equipment) 11) whether there have been any changes in the entity's disclosure entities, related parties, and public-private partnerships 12) whether there have been any significant new transactions with		

Subsequent Events Review – Audit Procedures	Initials and date	Doc. ref.
disclosure entities, related parties, and public-private partnerships 13) whether the entity has entered into any significant unusual transactions 14) [For audits of internal control over financial reporting] whether there were any changes in internal control over financial reporting or conditions that might significantly affect internal control over financial reporting subsequent to the balance sheet date but before the date of the auditor's report (AU-C 940.06b and .48)		
IV. Read minutes and related reports 1) Read the available minutes of meetings of management and/or those charged with governance, such as entity management committees, audit committees, or other appropriate groups, held after the date of the financial statements for information about events or transactions authorized or discussed that may require adjustment to or disclosure in the financial statements (AU-C 560.10c). 2) With regard to meetings for which no minutes are available, inquire about matters discussed at such meetings and conclusions reached (AU-C 560.10c). 3) Obtain additional information about changes in internal control or other conditions that might significantly affect the effectiveness of the entity's internal control over financial reporting, by inquiring about and reading, for this subsequent period, the following (AU-C 940.48): • Relevant internal audit (or inspector general) reports issued during the subsequent period. • Reports regarding deficiencies issued by other Independent auditors. • Information about the effectiveness of the entity's internal control over financial reporting obtained through other engagements performed for the entity by the auditor.		

Subsequent Events Review – Audit Procedures	Initials and date	Doc. ref.
V. Litigation, claims, and assessments 1) Determine if there are subsequent events related to litigation, claims, and assessments (see FAM 1002).		
VI. Coverage in management representation letter 1) Obtain representation in the management representation letter regarding whether any events occurred subsequent to the date of the financial statements that management should adjust for or disclose in the financial statements. See FAM 1001. 2) Obtain written representations from management relating to any changes in internal control or other factors that might significantly affect internal control subsequent to the date as of which internal control is being examined.		
VII. Other 1) Use other sources of information to learn of subsequent events, such as a) the inspector general or internal audit department, b) program divisions, and c) newspapers or other media sources. 2) Make additional inquiries or perform additional procedures deemed necessary to resolve any questions raised in the foregoing audit steps.		
VIII. Summarize 1) Prepare a summary memo documenting the results of the work performed above and conclusions reached. If subsequent events were identified, ensure that the information was treated appropriately in the financial statements.		

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