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AICPA Professional Standards: Accounting and Review Standards as of June 1, 2004

American Institute of Certified Public Accountants. Accounting and Review Services Committee

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AICPA Professional Standards

Volume 2

Accounting and Review Services

Code of Professional Conduct

Bylaws

Consulting Services

Quality Control

Peer Review

Tax Services

Personal Financial Planning

Continuing Professional Education

As of June 1, 2004

AR Section

STATEMENTS ON STANDARDS FOR ACCOUNTING AND REVIEW SERVICES

Statements on Standards for Accounting and Review Services are issued by the AICPA Accounting and Review Services Committee, the senior technical committee of the Institute designated to issue pronouncements in connection with the unaudited financial statements or other unaudited financial information of a nonpublic entity. Council has designated the AICPA Accounting and Review Services Committee as a body to establish technical standards under Rule 202 of the Institute's Code of Professional Conduct.

Interpretations are issued to provide guidance on the application of Statements on Standards for Accounting and Review Services (SSARS). Interpretations are issued after all members of the AICPA Accounting and Review Services Committee (ARSC) have been provided an opportunity to consider and comment on whether the proposed Interpretation is consistent with SSARS. An Interpretation is not as authoritative as a SSARS, but members should be aware that they may have to justify a departure from an Interpretation if the quality of their work is questioned.

TABLE OF CONTENTS

[The next page is 3309.]

AR Section 50

Standards for Accounting and Review Services

Issue date, unless otherwise indicated: May, 2004

.01 An accountant must perform a compilation or review of a nonpublic entity in accordance with Statements on Standards for Accounting and Review Services (SSARS) issued by the American Institute of Certified Public Accountants. SSARS provide a measure of quality and the objectives to be achieved in both a compilation and review.

.02 The SSARS are issued by the AICPA Accounting and Review Services Committee (ARSC) and provide performance and reporting standards for compilations and reviews.

.03 Rule 202, *Compliance With Standards*, of the AICPA Code of Professional Conduct [ET section 202.01], requires an AICPA member who performs compilations or reviews to comply with standards promulgated by the ARSC. The ARSC develops and issues standards in the form of Statements on Standards for Accounting and Review Services through a due process that includes deliberations in meetings open to the public, public exposure of proposed SSARS, and a formal vote. The SSARS are codified.

.04 The accountant should have sufficient knowledge of the SSARS to identify those that are applicable to his or her engagement. The nature of the SSARS requires an accountant to exercise professional judgment in applying them. The accountant should be prepared to justify departures from the SSARS.

Interpretative Publications

.05 *Interpretative publications* consist of compilation and review Interpretations of the SSARS, appendixes to the SSARS, compilation and review guidance included in AICPA *Audit and Accounting Guides*, and AICPA Statements of Position to the extent that those Statements are applicable to compilation and review engagements. Interpretative publications are not standards for accounting and review services. Interpretative publications are recommendations on the application of the SSARS in specific circumstances, including engagements for entities in specialized industries. An interpretative publication is issued after all ARSC members have been provided an opportunity to consider and comment on whether the proposed interpretative publication is consistent with the SSARS.

.06 The accountant should be aware of and consider interpretative publications applicable to his or her compilation or review. If the accountant does not apply the guidance included in an applicable interpretative publication, the accountant should be prepared to explain how he or she complied with the SSARS provisions addressed by such guidance.

Other Compilation and Review Publications

.07 *Other compilation and review publications* include AICPA accounting and review publications not referred to above; AICPA's annual *Compilation and Review Alert*; compilation and review articles in the *Journal of Accountancy* and other professional journals; compilation and review articles in the AICPA *The CPA Letter*; continuing professional education programs and other instruction materials, textbooks, guide books, compilation and review programs, and checklists; and other compilation and review publications from state CPA societies, other organizations, and individuals.[1] Other compilation and review publications have no authoritative status; however, they may help the accountant understand and apply the SSARS.

.08 If an accountant applies the guidance included in an other compilation and review publication, he or she should be satisfied that, in his or her judgment, it is both relevant to the circumstances of the engagement, and appropriate. In determining whether an other compilation and review publication is appropriate, the accountant may wish to consider the degree to which the publication is recognized as being helpful in understanding and applying the SSARS and the degree to which the issuer or author is recognized as an authority in compilation and review matters. Other compilation and review publications published by the AICPA that have been reviewed by the AICPA Audit and Attest Standards staff are presumed to be appropriate.

Predecessor's Compilation or Review Report

.09 SSARS currently provide guidance to be followed when the financial statements of a prior period have been compiled or reviewed by a predecessor accountant whose report is not presented and the successor accountant has not compiled or reviewed those financial statements. This Statement amends footnote 9 in SSARS No. 2, *Reporting on Comparative Financial Statements* [section 200.17], to state that a successor accountant may name the predecessor accountant if the predecessor accountant's practice was acquired by, or merged with, that of the successor accountant. New language is shown in boldface italics.

> [9] The successor ***accountant*** should not name the predecessor ***accountant*** in his ***or her*** report***; however, the successor accountant may name the predecessor accountant if the predecessor accountant's practice was acquired by, or merged with, that of the successor accountant***.

Effective Date

.10 This Statement is effective upon issuance.

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[1] The accountant is not expected to be aware of the full body of other compilation and review publications.

AR Section 100

Compilation and Review of Financial Statements[*]

Issue date, unless otherwise indicated: December, 1978

.01 This Statement sets forth the performance and communication requirements when an accountant submits unaudited financial statements of a nonpublic entity to his or her client or third parties. The accountant should not submit unaudited financial statements of a nonpublic entity to his or her client or a third party unless, as a minimum, he or she complies with the provisions of this section applicable to a compilation engagement.

a. *Compilation of financial statements*.[1] If the accountant performs a compilation, a communication to management is required. The type of communication depends on the following.

1. If the accountant is engaged to report on compiled financial statements or submits financial statements to a client that are or reasonably might be expected to be used by a third party, see paragraphs .11 through .19 for reporting requirements.
2. If the accountant submits financial statements to a client that are not reasonably expected to be used by a third party, see paragraphs .20 through .23 for required communications to management.

In deciding whether the financial statements are or reasonably might be expected to be used by a third party, the accountant may rely on management's representation without further inquiry, unless information comes to his or her attention that contradicts management's representation.

In each of the above circumstances, the performance requirements in paragraphs .05 and .07 through .10 apply.

b. *Review of financial statements*.[2] If the accountant performs a review, see paragraphs .05 and .24 through .43 for performance and reporting requirements.

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[*] This section has been revised to reflect the amendments and conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 8, effective for financial statements submitted after December 31, 2000. The amendments provide communication and performance requirements for unaudited financial statements submitted to a client that are not expected to be used by a third party. Specifically, the amendments are to the replacement of paragraphs .01 through .22 with new paragraphs .01 through .23 (subsequent paragraphs and footnotes have been renumbered accordingly), the addition of a new Appendix A [paragraph .61] and D [paragraph .64], and the deletion of former Appendix E [paragraph [.67]]. In addition, conforming changes to terminology and cross references have been made throughout this section.

[1] See Appendix A [paragraph .61], "Compilation of Financial Statements," for a flowchart describing the requirements of Statements on Standards for Accounting and Review Services (SSARSs) for a compilation engagement.

[2] Statements on Auditing Standards (SASs) provide guidance to the accountant who performs services in connection with the unaudited financial statements of a public entity. However, if a public entity does not have its annual financial statements audited, an accountant may review the entity's annual or interim financial statements in accordance with SSARSs as permitted by footnote 4 of SAS No. 26, *Association With Financial Statements* [AU section 504.05].

.02 If the accountant performs more than one service (for example, a compilation and an audit), the accountant should issue the report that is appropriate for the highest level of service rendered.[3]

.03 An accountant should not consent to the use of his or her name in a document or written communication containing unaudited financial statements of a nonpublic entity unless (*a*) the accountant has compiled or reviewed the financial statements in compliance with the provisions of this Statement or (*b*) the financial statements are accompanied by an indication that the accountant has not compiled or reviewed the financial statements and that the accountant assumes no responsibility for them. For example, the indication may be worded as follows:

> The accompanying balance sheet of X Company as of December 31, 20X1, the related statements of income, and cash flows for the year then ended were not audited, reviewed, or compiled by us and, accordingly, we do not express an opinion or any other form of assurance on them.

If an accountant becomes aware that his or her name has been used improperly in any client-prepared document containing unaudited financial statements, the accountant should advise the client that the use of his or her name is inappropriate and should consider what other actions might be appropriate, including consultation with his or her attorney. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Definitions

.04 Certain terms are defined for purposes of this Statement as follows.

Submission of financial statements. Presenting to a client or third parties financial statements that the accountant has prepared either manually or through the use of computer software.

Third party. All parties except for members of management who are knowledgeable about the nature of the procedures applied and the basis of accounting and assumptions used in the preparation of the financial statements.[4]

Nonpublic entity. Any entity other than (*a*) one whose securities trade in a public market either on a stock exchange (domestic or foreign) or in the over-the-counter market, including securities quoted only locally or regionally; (*b*) one that makes a filing with a regulatory agency in preparation for the sale of any class of its securities in a public market; or (*c*) a subsidiary, corporate joint venture, or other entity controlled by an entity covered by (*a*) or (*b*). (See SSARS No. 2, *Reporting on Comparative Financial Statements* [section 200]).

Financial statement. A presentation of financial data, including accompanying notes, derived from accounting records and intended to communicate an entity's economic resources or obligations at a point in time, or the changes therein for a period of time, in accordance with generally accepted accounting principles

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[3] SSARS No. 3, *Compilation Reports on Financial Statements Included in Certain Prescribed Forms* [section 300], permits an accountant who has reviewed the financial statements of a nonpublic entity to issue a compilation report on financial statements for the same period that are included in a prescribed form that calls for departure from generally accepted accounting principles (GAAP).

[4] The accountant may wish to specify those members of management. See Appendix F [paragraph .66], "Compilation of Financial Statements Not Intended for Third-Party Use—Illustrative Engagement Letter." [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

(GAAP)[5] or a comprehensive basis of accounting other than GAAP.[6] Financial forecasts, projections and similar presentations,[7] and financial presentations included in tax returns are not financial statements for purposes of this Statement. The following financial presentations are examples of financial statements:[8]

- Balance sheet
- Statement of income
- Statement of comprehensive income
- Statement of retained earnings
- Statement of cash flows
- Statement of changes in owners' equity
- Statement of assets and liabilities (with or without owners' equity accounts)
- Statement of revenue and expenses
- Statement of financial position
- Statement of activities
- Summary of operations
- Statement of operations by product lines
- Statement of cash receipts and disbursements

A financial statement may be, for example, that of a corporation, a consolidated group of corporations, a combined group of affiliated entities, a not-for-profit organization, a governmental entity, an estate or trust, a partnership, a proprietorship, a segment of any of these, or an individual. The method of preparation (for example, manual or computer preparation) is not relevant to the definition of a financial statement.

Compilation of financial statements. Presenting in the form of financial statements[9] information that is the representation of management (owners) without undertaking to express any assurance on the statements. (The accountant might consider it necessary to perform other accounting services to compile the financial statements. See paragraph .08.)

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[5] The definition of GAAP and the hierarchy of established accounting principles presented in SAS No. 69, *The Meaning of* Present Fairly in Conformity With Generally Accepted Accounting Principles [AU section 411], is also applicable to compilations and reviews of financial statements performed under SSARSs. [Title of AU section 411 revised, October 2000, to reflect conforming changes necessary due to the issuance of Statement on Auditing Standards No. 93.]

[6] The term *comprehensive basis of accounting other than generally accepted accounting principles* is defined in SAS No. 62, *Special Reports*, paragraph .04 [AU section 623.04]. Hereafter, reference to GAAP in this statement includes, where applicable, another comprehensive basis of accounting (OCBOA). SAS No. 62, paragraphs 9 and 10 [AU section 623.09 and .10], provides guidance on evaluating the adequacy of disclosure in financial statements prepared in conformity with OCBOA.

[7] Statement on Standards for Attestation Engagements No. 10, chapter 3, *Financial Forecasts and Projections* [AT section 301], as well as the AICPA *Guide for Prospective Financial Information*, provide guidance on preparing and reporting on financial forecasts, projections, and similar presentations. [Footnote revised, January 2001, to reflect conforming changes necessary due to the issuance of Statement on Standards for Attestation Engagements No. 10.]

[8] SAS No. 62, paragraph .07 [AU section 623.07], provides guidance with respect to suitable titles for financial statements that are prepared in conformity with OCBOA other than GAAP.

[9] Paragraphs .16 through .18 provide guidance to the accountant engaged to compile financial statements that omit substantially all the disclosures required by GAAP or OCBOA.

Review of financial statements. Performing inquiry and analytical procedures that provide the accountant with a reasonable basis for expressing limited assurance that there are no material modifications that should be made to the statements for them to be in conformity with GAAP or, if applicable, with an other comprehensive basis of accounting (OCBOA). (The accountant might consider it necessary to compile the financial statements or to perform other accounting services to enable him or her to perform a review. See paragraph .34.)

The objective of a review differs significantly from the objective of a compilation. The inquiry and analytical procedures performed in a review should provide the accountant with a reasonable basis for expressing limited assurance that there are no material modifications that should be made to the financial statements. No expression of assurance is contemplated in a compilation.

The objective of a review also differs significantly from the objective of an audit of financial statements in accordance with generally accepted auditing standards (GAAS). The objective of an audit is to provide a reasonable basis for expressing an opinion regarding the financial statements taken as a whole. A review does not provide a basis for the expression of such an opinion because a review does not contemplate obtaining an understanding of internal control or assessing control risk; tests of accounting records and of responses to inquiries by obtaining corroborating evidential matter through inspection, observation, or confirmation; and certain other procedures ordinarily performed during an audit. A review may bring to the accountant's attention significant matters affecting the financial statements, but it does not provide assurance that the accountant will become aware of all significant matters that would be disclosed in an audit. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Understanding With the Entity

.05 The accountant should establish an understanding with the entity, preferably in writing, regarding the services to be performed. However, if the engagement is to compile financial statements not expected to be used by a third party, a written communication is required. (See paragraphs .20 and .21.) The understanding should include a description of the nature and limitations of the services to be performed and a description of the report, if a report is to be issued. The understanding should also provide (*a*) that the engagement cannot be relied upon to disclose errors, fraud, or illegal acts and (*b*) that the accountant will inform the appropriate level of management[10] of any material errors that come to his or her attention and any fraud or illegal acts that come to his or her attention, unless they are clearly inconsequential. Examples of engagement letters are presented in Appendixes C [paragraph .63], D [paragraph .64], and E [paragraph .65].

Compilation of Financial Statements

.06 Paragraphs .07 through .10 are applicable to a compilation of financial statements, whenever the accountant—

- Is engaged to report on compiled financial statements.
- Submits financial statements to a client that are or reasonably might be expected to be used by a third party.

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[10] When a fraud or illegal act involves senior management, the accountant should report the matter to an individual or group at a higher level within the entity, such as the manager (owner) or the board of directors.

- Submits financial statements to a client that are not expected to be used by a third party.

Compilation Performance Requirements

.07 The accountant should possess a level of knowledge of the accounting principles and practices of the industry in which the entity operates that will enable him or her to compile financial statements that are appropriate in form for an entity operating in that industry.[11] This standard does not prevent an accountant from accepting a compilation engagement for an entity in an industry with which the accountant has no previous experience. It does, however, place upon the accountant a responsibility to obtain the required level of knowledge. The accountant may do so, for example, by consulting AICPA guides, industry publications, financial statements of other entities in the industry, textbooks and periodicals, or individuals knowledgeable about the industry.

.08 To compile financial statements, the accountant should possess a general understanding of the nature of the entity's business transactions, the form of its accounting records, the stated qualifications of its accounting personnel, the accounting basis on which the financial statements are to be presented, and the form and content of the financial statements. The accountant ordinarily obtains knowledge of these matters through experience with the entity or inquiry of the entity's personnel. On the basis of that understanding, the accountant should consider whether it will be necessary to perform other accounting services, such as assist in adjusting the books of account or consult on accounting matters, when he or she compiles financial statements.

.09 The accountant is not required to make inquiries or perform other procedures to verify, corroborate, or review information supplied by the entity. However, the accountant may have made inquiries or performed other procedures. The results of such inquiries or procedures, knowledge gained from prior engagements, or the financial statements on their face may cause the accountant to become aware that information supplied by the entity is incorrect, incomplete, or otherwise unsatisfactory. In such circumstances, the accountant should obtain additional or revised information. If the entity refuses to provide additional or revised information, the accountant should withdraw from the engagement. (However, see paragraphs .16 through .18 for guidance when management elects to omit substantially all the disclosures required by GAAP and see paragraphs .45 through .47 for the accountant's reporting responsibilities when he or she is aware of other departures from GAAP.) [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.10 Before submission, the accountant should read the financial statements and consider whether such financial statements appear to be appropriate in form and free from obvious material errors. In this context, the term *error* refers to mistakes in the compilation of financial statements, including arithmetical or clerical mistakes, and mistakes in the application of accounting principles, including inadequate disclosure.

Reporting on the Financial Statements

.11 When the accountant is engaged to report on compiled financial statements or submits financial statements that are reasonably expected to be

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[11] For purposes of this Statement, the term *industry* includes governmental and not-for-profit activities.

used by a third party, the financial statements should be accompanied by a report. The basic elements of the report are as follows:

a. A statement that a compilation has been performed in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants

b. A statement that a compilation is limited to presenting in the form of financial statements information that is the representation of management (owners)

c. A statement that the financial statements have not been audited or reviewed and, accordingly, the accountant does not express an opinion or any other form of assurance on them

d. A signature of the accounting firm or the accountant as appropriate (For example, the signature could be manual, stamped, electronic, or typed.)

e. The date of the compilation report (The date of completion of the compilation should be used as the date of the accountant's report.)

Any other procedures that the accountant might have performed before or during the compilation engagement should not be described in the report. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

[.12] [Paragraph deleted by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

.13 Each page of the financial statements compiled by the accountant should include a reference, such as "See Accountant's Compilation Report."

.14 The following form of standard report is appropriate for a compilation:[12]

> I (we) have compiled the accompanying balance sheet of XYZ Company as of December 31, 20X1, and the related statements of income, retained earnings,[13] and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.
>
> A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

.15 An accountant may be asked to issue a compilation report on one financial statement, such as a balance sheet, and not on other related financial statements, such as the statements of income, retained earnings, and cash flows. This Statement does not preclude the accountant from doing so. Also, an accountant may be asked to compile financial statements included in a prescribed form that calls for departure from GAAP. SSARS No. 3, *Compilation Reports on Financial Statements Included in Certain Prescribed Forms* [section 300], provides additional guidance, including an alternative form of standard report, applicable to such compilation engagements.

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[12] If the statement of comprehensive income is included, the first paragraph of the report should also refer to this statement. [Footnote added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

[13] APB Opinion No. 12, *Omnibus Opinion—1967*, requires the disclosure of a change in capital. This can be accomplished by the preparation of a separate statement, in the notes to the financial statements, or as part of another basic statement. If the accountant does not include a statement of retained earnings as a separate statement, reference in the compilation report is not needed. [Footnote added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Reporting on Financial Statements That Omit Substantially All Disclosures

.16 An entity may request an accountant to compile financial statements that omit substantially all the disclosures required by GAAP, including disclosures that might appear in the body of the financial statements.[14] (As previously noted, reference to GAAP in this Statement includes, where applicable, OCBOA.) The accountant may compile such financial statements provided the omission of substantially all disclosures is clearly indicated in the report and is not, to his or her knowledge, undertaken with the intention of misleading those who might reasonably be expected to use such financial statements. When the entity wishes to include disclosures about only a few matters in the form of notes to such financial statements, such disclosures should be labeled "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included."

.17 Notwithstanding the above, if financial statements compiled in conformity with a comprehensive basis of accounting other than GAAP do not include disclosure of the basis of accounting used, the basis should be disclosed in the accountant's report.

.18 When financial statements that the accountant has compiled omit substantially all disclosures,[15] the following form of standard report is appropriate.

> I (we) have compiled the accompanying balance sheet of XYZ Company as of December 31, 20XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.
>
> A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.
>
> Management has elected to omit substantially all the disclosures (and the statement of cash flows) required by generally accepted accounting principles. If the omitted disclosures and statements were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

Reporting When the Accountant Is Not Independent

.19 An accountant is not precluded from issuing a report with respect to a compilation of financial statements for an entity with respect to which the accountant is not independent.[16] If the accountant is not independent, he or she should specifically disclose the lack of independence. However, the reason

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[14] See paragraphs .45 through .47 for the accountant's responsibilities when he or she is aware of other departures from GAAP. However, see SSARS No. 3, *Compilation Reports on Financial Statements Included in Certain Prescribed Forms* [section 300], for guidance when such financial statements are included in a prescribed form and the prescribed form or related instructions do not request the disclosures required by GAAP. [Footnote renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

[15] If the statement of cash flows is omitted, the first and third paragraphs of the report should be modified accordingly. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

[16] In making a judgment about whether he or she is independent, the accountant should be guided by the AICPA *Code of Professional Conduct*. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

for the lack of independence should not be described. When the accountant is not independent, the following should be included as the last paragraph of the report:

I am (we are) not independent with respect to XYZ Company.

Accountant's Communications With the Client When the Compiled Financial Statements Are Not Expected to Be Used by a Third Party

.20 When an accountant submits unaudited financial statements to his or her client that are not expected to be used by a third party, he or she should either—

- Issue a compilation report in accordance with the reporting requirements discussed in paragraphs .11 through .19.
- Document an understanding with the entity through the use of an engagement letter, preferably signed by management, regarding the services to be performed and the limitations on the use of those financial statements. (Appendix D [paragraph .64] contains "Compilation of Financial Statements Not Intended for Third-Party Use—Illustrative Engagement Letter.")

.21 The documentation of the understanding should include the following descriptions or statements:

- The nature and limitations of the services to be performed.
- A compilation is limited to presenting in the form of financial statements information that is the representation of management.
- The financial statements will not be audited or reviewed.
- No opinion or any other form of assurance on the financial statements will be provided.
- Management has knowledge about the nature of the procedures applied and the basis of accounting and assumptions used in the preparation of the financial statements.
- Acknowledgment of management's representation and agreement that the financial statements are not to be used by third parties.
- The engagement cannot be relied upon to disclose errors, fraud, or illegal acts.

The documentation of the understanding should also address the following additional matters if applicable:

- Material departures from GAAP or OCBOA may exist and the effects of those departures, if any, on the financial statements may not be disclosed.
- Substantially all disclosures (and statement of cash flows, if applicable) required by GAAP or OCBOA may be omitted.
- Lack of independence.
- Refer to supplementary information.

Such an understanding reduces the risk that the accountant or the client may misinterpret the needs or expectations of the other party. If the accountant believes an understanding with the client has not been established, he or she should decline to accept or perform the engagement.

.22 The accountant should include a reference on each page of the financial statements restricting their use such as "Restricted for Management's Use Only," or "Solely for the information and use by the management of [*name of entity*] and not intended to be and should not be used by any other party."

.23 If the accountant becomes aware that the financial statements have been distributed to third parties, the accountant should discuss the situation with the client and request that the client have the statements returned. If the client does not comply with this request within a reasonable period of time, the accountant should notify known third parties that the financial statements are not intended for third-party use, preferably in consultation with his or her attorney.

Review of Financial Statements

.24 Paragraphs .25 through .44 provide additional guidance applicable to a review of financial statements. Procedures for conducting a review of financial statements generally are limited to analytical procedures and inquiries. The accountant performs these procedures to obtain a basis for communicating whether he or she is aware of any material modifications that should be made to the financial statements for them to be in conformity with generally accepted accounting principles. The specific inquiries made and the analytical and other procedures performed should be tailored to the engagement based on the accountant's knowledge of the entity's business. For example, if the accountant becomes aware of a significant change in the entity's operations, the accountant may consider making additional inquiries, employing additional analytical procedures, or both. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. As amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.25 A review does not contemplate obtaining an understanding of internal control or assessing control risk, tests of accounting records and of responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit. Thus, a review does not provide assurance that the accountant will become aware of all significant matters that would be disclosed in an audit. However, if the accountant becomes aware that information coming to his or her attention is incorrect, incomplete, or otherwise unsatisfactory, the accountant should perform the additional procedures deemed necessary to achieve limited assurance that there are no material modifications that should be made to the financial statements in order for the statements to be in conformity with generally accepted accounting principles. (See paragraph .42 for guidance when an accountant is unable to complete a review and paragraphs .45 through .47 for the accountant's responsibilities when he or she is aware of departures from generally accepted accounting principles.) [Paragraph renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

Knowledge of Accounting Principles and Practices of the Industry

.26 The accountant should possess a level of knowledge of the accounting principles and practices of the industry in which the entity operates and an understanding of the entity's business[17] that will provide, through the performance of inquiry and analytical procedures, a reasonable basis for expressing limited assurance that there are no material modifications that should be made to the financial statements in order for the statements to be in conformity with generally accepted accounting principles. (As previously noted, reference to generally accepted accounting principles in this Statement includes, where applicable, an other comprehensive basis of accounting.) [Paragraph renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.27 The requirement that the accountant possess a level of knowledge of the accounting principles and practices of the industry in which the entity operates does not prevent an accountant from accepting a review engagement for an entity in an industry with which the accountant has no previous experience. It does, however, place upon the accountant a responsibility to obtain the required level of knowledge. He may do so, for example, by consulting AICPA guides, industry publications, financial statements of other entities in the industry, textbooks and periodicals, or individuals knowledgeable about the industry. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.28 The accountant's understanding of the entity's business should include a general understanding of the entity's organization, its operating characteristics, and the nature of its assets, liabilities, revenues, and expenses. This would ordinarily involve a general knowledge of the entity's production, distribution, and compensation methods, types of products and services, operating locations, and material transactions with related parties. An accountant's understanding of an entity's business is ordinarily obtained through experience with the entity or its industry and inquiry of the entity's personnel. [Paragraph renumbered by Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Analytical Procedures

.29 The accountant should apply analytical procedures to the financial statements to identify and provide a basis for inquiry about the relationships and individual items that appear to be unusual and that may indicate a material misstatement. Analytical procedures should include:

- Developing expectations by identifying and using plausible relationships that are reasonably expected to exist based on the accountant's understanding of the entity and the industry in which the entity operates.
- Comparing recorded amounts, or ratios developed from recorded amounts, to expectations developed by the accountant.

See Appendix H [paragraph .68] for examples of analytical procedures an accountant may consider performing when conducting a review of financial statements. [Paragraph added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

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[17] For purposes of this Statement, the term *business* includes not-for-profit entities. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

.30 Expectations developed by the accountant in performing analytical procedures in connection with a review of financial statements ordinarily are less encompassing than those developed in an audit. Also, in a review the accountant ordinarily is not required to corroborate management's responses with other evidence. However, the accountant should consider the reasonableness and consistency of management's responses in light of the results of other review procedures and the accountant's knowledge of the entity's business and the industry in which it operates. [Paragraph added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

Inquiries and Other Review Procedures

.31 The following are inquiries the accountant should consider making and other review procedures the accountant should consider performing when conducting a review of financial statements:

a. Inquiries to members of management who have responsibility for financial and accounting matters concerning (see Appendix B [paragraph .62]):

1. Whether the financial statements have been prepared in conformity with generally accepted accounting principles consistently applied.
2. The entity's accounting principles and practices and the methods followed in applying them and procedures for recording, classifying, and summarizing transactions, and accumulating information for disclosure in the financial statements.
3. Unusual or complex situations that may have an effect on the financial statements.
4. Significant transactions occurring or recognized near the end of the reporting period.
5. The status of uncorrected misstatements identified during the previous engagement.
6. Questions that have arisen in the course of applying the review procedures.
7. Events subsequent to the date of the financial statements that could have a material effect on the financial statements.
8. Their knowledge of any fraud or suspected fraud affecting the entity involving management or others where the fraud could have a material effect on the financial statements, for example, communications received from employees, former employees, or others.
9. Significant journal entries and other adjustments.
10. Communications from regulatory agencies.

b. Inquiries concerning actions taken at meetings of stockholders, board of directors, committees of the board of directors, or comparable meetings that may affect the financial statements.

c. Reading the financial statements to consider, on the basis of information coming to the accountant's attention, whether the financial statements appear to conform with generally accepted accounting principles.

d. Obtaining reports from other accountants, if any, who have been engaged to audit or review the financial statements of significant components of the reporting entity, its subsidiaries, and other investees.[18]

[Paragraph renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

Management Representations

.32 Written representations are required from management for all financial statements and periods covered by the accountant's review report. For example, if comparative financial statements are reported on, the representations obtained at the completion of the most recent review should address all periods being reported on. The specific written representations obtained by the accountant will depend on the circumstances of the engagement and the nature and basis of presentation of the financial statements. In connection with a review of financial statements presented in accordance with generally accepted accounting principles, specific representations should relate to the following matters:[19]

a. Management's acknowledgment of its responsibility for the fair presentation in the financial statements of financial position, results of operations, and cash flows in conformity with generally accepted accounting principles

b. Management's belief that the financial statements are fairly presented in conformity with generally accepted accounting principles

c. Management's acknowledgement of its responsibility to prevent and detect fraud

d. Knowledge of any fraud or suspected fraud affecting the entity involving management or others where the fraud could have a material effect on the financial statements, including any communications received from employees, former employees, or others

e. Management's full and truthful response to all inquiries

f. Completeness of information

g. Information concerning subsequent events

The representation letter ordinarily should be tailored to include additional appropriate representation from management relating to matters specific to the entity's business or industry. An illustrative representation letter is presented in Appendix F [paragraph .66]. [Paragraph added, effective for review

[18] The financial statements of the reporting entity ordinarily include an accounting for all significant components, such as unconsolidated subsidiaries and investees. If other accountants are engaged to audit or review the financial statements of such components, the accountant will require reports from the other accountants as a basis, in part, for the accountant's review report with respect to the review of the financial statements of the reporting entity. The accountant may decide to make reference to the work of other accountants in the accountant's review report on the financial statements. If such reference is made, the report should indicate the magnitude of the portion of the financial statements audited or reviewed by the other accountants. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. As amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

[19] Specific representations also are applicable to financial statements presented in conformity with a comprehensive basis of accounting other than generally accepted accounting principles. The specific representations to be obtained should be based on the nature and basis of presentation of the financial statements being reviewed. [Footnote added, effective for review reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9.]

reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9. Paragraph renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.33 The written representations should be addressed to the accountant. Because the accountant is concerned with events occurring through the date of the report that may require adjustment to or disclosure in the financial statements, the representations should be made as of a date no earlier than the date of the accountant's report. The letter should be signed by those members of management whom the accountant believes are responsible for and knowledgeable, directly or through others in the organization, about the matters covered in the representation letter. Normally, the chief executive officer and chief financial officer or others with equivalent positions in the entity should sign the representation letter. If the current management was not present during all periods covered by the accountant's report, the accountant should nevertheless obtain written representations from current management on all such periods. [Paragraph renumbered and amended, effective for review reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.34 Knowledge acquired in the performance of audits of the entity's financial statements, compilation of the financial statements, or other accounting services may result in modification of the review procedures described in paragraphs .29 through .31. However, such modification would not reduce the degree of responsibility the accountant assumes with respect to the reviewed financial statements. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

Documentation in a Review Engagement

.35 The accountant should prepare documentation in connection with a review of financial statements, the form and content of which should be designed to meet the circumstances of the particular engagement. Documentation is the principal record of the review procedures performed and the conclusions reached by the accountant in performing the review. However, an accountant would not be precluded from supporting his or her review report by other means in addition to the review documentation. Such other means might include written documentation contained in other engagement (for example compilation) files or quality control files (for example consultation files) and in limited situations, oral explanations. Oral explanations should be limited to those situations where the accountant finds it necessary to supplement or clarify information contained in the documentation. Oral explanations should not be the principal support for the work performed or the conclusions reached. [Paragraph added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.36 Because of the different circumstances in individual engagements, it is not possible to specify the form or content of the documentation the accountant should prepare. However, the documentation should include any findings or issues that in the accountant's judgment are significant, for example, the results of review procedures that indicate the financial statements could be materially misstated, including actions taken to address such findings, and the basis for the final conclusions reached. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.37 The documentation of the inquiry and analytical procedures should include the following:

a. The matters covered in the accountant's inquiry procedures.

b. The analytical procedures performed.

c. The expectations as discussed in paragraph .29, where significant expectations are not otherwise readily determinable from the documentation of the work performed, and factors considered in the development of those expectations.

d. Results of the comparison of the expectations to the recorded amounts or ratios developed from recorded amounts.

e. Any additional procedures performed in response to significant unexpected differences arising from the analytical procedure and the results of such additional procedures.

f. Unusual matters that the accountant considered during the performance of the review procedures, including their disposition.

g. The representation letter.

[Paragraph added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

Reporting on the Financial Statements

.38 Financial statements reviewed by an accountant should be accompanied by a report. The basic elements of the report are as follows:

a. A statement that a review has been performed in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants

b. A statement that all information included in the financial statements is the representation of the management (owners) of the entity

c. A statement that a review consists principally of inquiries of company personnel and analytical procedures applied to financial data

d. A statement that a review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements taken as a whole and, accordingly, no such opinion is expressed

e. A statement that the accountant is not aware of any material modifications that should be made to the financial statements in order for them to be in conformity with generally accepted accounting principles, other than those modifications, if any, indicated in the report

f. A signature of the accounting firm or the accountant as appropriate (For example, the signature could be manual, stamped, electronic, or typed.)

g. The date of the review report (The date of the completion of the accountant's review procedures should be used as the date of the accountant's report.)

Any other procedures that the accountant might have performed before or during the review engagement, including those performed in connection with a compilation of the financial statements, should not be described in the report. [Paragraph renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

[.39] [Paragraph renumbered and deleted by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.40 Each page of the financial statements reviewed by the accountant should include a reference such as "See Accountant's Review Report." [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.41 The following form of standard report is appropriate for a review.[20]

> I (we) have reviewed the accompanying balance sheet of XYZ Company as of December 31, 20X1, and the related statements of income, retained earnings,[21] and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management (owners) of XYZ Company.
>
> A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (we) do not express such an opinion.
>
> Based on my (our) review, I am (we are) not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with generally accepted accounting principles.

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.42 When an accountant is unable to perform the inquiry and analytical procedures he or she considers necessary to achieve the limited assurance contemplated by a review, or the client does not provide the accountant with a representation letter, the review will be incomplete. A review that is incomplete is not an adequate basis for issuing a review report. In such a situation, the accountant should consider the matters discussed in paragraphs .50 through .55

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[20] See paragraphs .45 through .47 for the accountant's responsibilities with respect to departures from generally accepted accounting principles.

If the statement of comprehensive income is included, the first paragraph of the report should also refer to this statement. [Footnote renumbered and amended, effective November 2002, by the issuance of Statement on Standards for Accounting and Review Services No. 9.]

[21] APB Opinion No. 12 requires the disclosure of a change in capital. This can be accomplished by the preparation of a separate statement, in the notes to the financial statements, or as part of another basic statement. If the accountant does not include a statement of retained earnings as a separate statement, reference in the review report is not needed. [Footnote added, effective November 2002, by the issuance of Statement on Standards for Accounting and Review Services No. 9.]

in deciding whether it is appropriate to issue a compilation report on the financial statements. [Paragraph renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.43 An accountant may be asked to issue a review report on one financial statement, such as a balance sheet, and not on other related financial statements, such as the statements of income, retained earnings, and cash flows. He may do so if the scope of his inquiry and analytical procedures has not been restricted. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.44 An accountant is precluded from issuing a review report on the financial statements of an entity with respect to which he is not independent.[22] If the accountant is not independent, he may issue a compilation report provided he complies with the compilation standards. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Departures From Generally Accepted Accounting Principles

.45 An accountant who is engaged to compile or review financial statements may become aware of a departure from generally accepted accounting principles (which include adequate disclosure) that is material to the financial statements. (As noted previously, reference in this statement to generally accepted accounting principles includes, where applicable, another comprehensive basis of accounting.) Paragraphs .16 through .18 provide guidance to the accountant when the departure relates to the omission of substantially all disclosures in the financial statements he has compiled. SSARS No. 3 [section 300] provides guidance when the departure is called for by a prescribed form or related instructions. In all other circumstances, if the financial statements are not revised, the accountant should consider whether modification of his standard report is adequate to disclose the departure. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.46 If the accountant concludes that modification of the standard report is appropriate,[23] the departure should be disclosed in a separate paragraph of

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[22] See footnote 16. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

[23] Normally, neither an uncertainty, including an uncertainty about an entity's ability to continue as a going concern, nor an inconsistency in the application of accounting principles would cause the accountant to modify the standard report provided the financial statements appropriately disclose such matters. Nothing in this statement, however, is intended to preclude an accountant from emphasizing in a separate paragraph of his or her report a matter regarding the financial statements. In evaluating the adequacy of the disclosure of going-concern uncertainties, the accountant should look to the guidance provided in SAS No. 59, *The Auditor's Consideration of an Entity's Ability to Continue as a Going Concern*, paragraphs 10 and 11 [AU section 341.10 and .11]. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

the report, including disclosure of the effects of the departure on the financial statements if such effects have been determined by management or are known as the result of the accountant's procedures. The accountant is not required to determine the effects of a departure if management has not done so, provided the accountant states in the report that such determination has not been made. Examples of compilation and review reports that disclose departures from generally accepted accounting principles follow.

Compilation Report

I (we) have compiled the accompanying balance sheet of XYZ Company as of December 31, 19XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them. However, I (we) did become aware of a departure (certain departures) from generally accepted accounting principles that is (are) described in the following paragraph(s).

(Separate paragraph)

As disclosed in note X to the financial statements, generally accepted accounting principles require that land be stated at cost. Management has informed me (us) that the company has stated its land at appraised value and that, if generally accepted accounting principles had been followed, the land account and stockholders' equity would have been decreased by $500,000.

or

A statement of cash flows for the year ended December 31, 19XX, has not been presented. Generally accepted accounting principles require that such a statement be presented when financial statements purport to present financial position and results of operations.[24]

Review Report

I (we) have reviewed the accompanying balance sheet of XYZ Company as of December 31, 19XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (we) do not express such an opinion.

Based on my (our) review, with the exception of the matter(s) described in the following paragraph(s), I am (we are) not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with generally accepted accounting principles.

(Separate paragraph)

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[24] If a statement of cash flows is not presented, the first paragraph of the compilation or review report should be modified accordingly. [Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

As disclosed in note X to the financial statements, generally accepted accounting principles require that inventory cost consist of material, labor, and overhead. Management has informed me (us) that the inventory of finished goods and work in process is stated in the accompanying financial statements at material and labor cost only, and that the effects of this departure from generally accepted accounting principles on financial position, results of operations, and cash flows have not been determined.

or

As disclosed in note X to the financial statements, the company has adopted (description of newly adopted method), whereas it previously used (description of previous method). Although the (description of newly adopted method) is in conformity with generally accepted accounting principles, the company does not appear to have reasonable justification for making a change as required by Opinion No. 20 of the Accounting Principles Board.

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.47 If the accountant believes that modification of his standard report is not adequate to indicate the deficiencies in the financial statements taken as a whole, he should withdraw from the compilation or review engagement and provide no further services with respect to those financial statements. The accountant may wish to consult with his legal counsel in those circumstances. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Subsequent Discovery of Facts Existing at Date of Report

.48 Subsequent to the date of the report on the financial statements that the accountant has compiled or reviewed, he may become aware that facts may have existed at that date which might have caused him to believe that information supplied by the entity was incorrect, incomplete, or otherwise unsatisfactory had he then been aware of such facts. In such circumstances, the accountant may wish to consider the guidance in section 561 of Statement on Auditing Standards No. 1 [AU section 561] in determining an appropriate course of action, giving due consideration to the different objectives of compilation, review, and audit engagements. Because of the legal implications involved in actions contemplated under section 561 of SAS No. 1 [AU section 561], the accountant should consider consulting with his attorney. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Supplementary Information

.49 When the basic financial statements are accompanied by information presented for supplementary analysis purposes, the accountant should clearly indicate the degree of responsibility, if any, he or she is taking with respect to such information.

- When the accountant has reviewed the basic financial statements, an explanation should be included in the review report, or in a separate report on the other data. The report should state that the review has been made primarily for the purpose of expressing limited assurance that there are no material modifications that should be made to the financial statements in order for them to be in conformity with generally accepted accounting principles, and either

a. The other data accompanying the financial statements are presented only for supplementary analysis purposes and have been subjected to the inquiry and analytical procedures applied in the review of the basic financial statements, and the accountant did not become aware of any material modifications that should be made to such data, or

b. The other data accompanying the financial statements are presented only for supplementary analysis purposes and have not been subjected to the inquiry and analytical procedures applied in the review of the basic financial statements, but were compiled from information that is the representation of management, without audit or review, and the accountant does not express an opinion or any other form of assurance on such data.

When the accountant has compiled both the basic financial statements and other data presented only for supplementary analysis purposes, the compilation report should refer to the other data or the accountant can issue a separate report on the other data. If a separate report is issued, the report should state that the other data accompanying the financial statements are presented only for supplementary analysis purposes and that the information has been compiled from information that is the representation of management, without audit or review, and the accountant does not express an opinion or any other form of assurance on such data.

[Paragraph renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Change in Engagement From Audit to Review or Compilation (or From Review to Compilation)

.50 An accountant who has been engaged to audit the financial statements of a nonpublic entity in accordance with generally accepted auditing standards (or an accountant who has been engaged to review the financial statements of a nonpublic entity in accordance with SSARSs) may, before the completion of the audit (review), be requested to change the engagement to a review or compilation (compilation) of financial statements. A request to change the engagement may result from a change in circumstances affecting the entity's requirement for an audit (review), a misunderstanding as to the nature of an audit, review, or compilation, or a restriction on the scope of the audit (review), whether imposed by the client or caused by circumstances. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.51 Before an accountant who was engaged to perform an audit in accordance with generally accepted auditing standards (or a review in accordance with

SSARSs) agrees to change the engagement to a review or compilation (compilation), at least the following should be considered:

a. The reason given for the client's request, particularly the implications of a restriction on the scope of the audit (review), whether imposed by the client or by circumstances.

b. The additional audit (review) effort required to complete the audit (review).

c. The estimated additional cost to complete the audit (review).

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.52 A change in circumstances that affects the entity's requirement for an audit (review), or a misunderstanding concerning the nature of an audit, review or compilation would ordinarily be considered a reasonable basis for requesting a change in the engagement. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.53 In considering the implications of a restriction on the scope of the audit (review), the accountant should evaluate the possibility that information affected by the scope restriction may be incorrect, incomplete, or otherwise unsatisfactory. Nevertheless, when the accountant has been engaged to audit an entity's financial statements and has been prohibited by the client from corresponding with the entity's legal counsel, the accountant ordinarily would be precluded from issuing a review or compilation report on the financial statements. If in an audit or a review engagement a client does not provide the accountant with a signed representation letter, the accountant would be precluded from issuing a review report on the financial statements and would ordinarily be precluded from issuing a compilation report on the financial statements. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.54 In all circumstances, if the auditing (review) procedures are substantially complete or the cost to complete such procedures is relatively insignificant, the accountant should consider the propriety of accepting a change in the engagement. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.55 If the accountant concludes, based upon his or her professional judgment, that there is reasonable justification to change the engagement and if he or she complies with the standards applicable to the changed engagement, the accountant should issue an appropriate review or compilation report. The report should not include reference to (*a*) the original engagement, (*b*) any auditing or review procedures that may have been performed, or (*c*) scope limitations that resulted in the changed engagement. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Comparative Financial Statements

[.56][25] [Paragraph deleted by the issuance of Statement on Standards for Accounting and Review Services No. 2, November 1979. Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 8, October 2000. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

Relationship of Statements on Standards for Accounting and Review Services to Quality Control Standards

.57 An accountant is responsible for compliance with Statements on Standards for Accounting and Review Services (SSARSs) in a review or compilation engagement. Rule 202 [ET section 202.01] of the Code of Professional Conduct of the American Institute of Certified Public Accountants requires members to comply with such standards when associated with reviewed or compiled financial statements. [Paragraph added, effective for review reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9. Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.58 An accountant has the responsibility to adopt a system of quality control in conducting an accounting practice.[26] Thus, a firm should establish quality control policies and procedures to provide it with reasonable assurance that its personnel comply with SSARS in its review and compilation engagements. The nature and extent of a firm's quality control policies and procedures depend on factors such as its size, the degree of operating autonomy allowed its personnel and its practice offices, the nature of its practice, its organization, and appropriate cost-benefit considerations. [Paragraph added, effective for review reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9. Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.59 SSARSs relate to the conduct on individual review and compilation engagements; Statements on Quality Control Standards (SQCSs) relate to the conduct of a firm's accounting practice. Thus, SSARSs and SQCSs are related, and the quality control policies and procedures that a firm adopts may affect both the conduct of an individual engagement and the firm's accounting practice as a whole. However, deficiencies in or instances of noncompliance with a firm's quality control policies and procedures do not, in and of themselves, indicate that a particular review or compilation engagement was not performed in accordance with SSARSs. [Paragraph added, effective for review reports dated January 1, 2003, or after, by Statement on Standards for Accounting and Review Services No. 9. Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

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[25] [Footnote deleted. Footnote renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

[26] The elements of quality control are identified in Statement on Quality Control Standards (SQCS) No. 2, *System of Quality Control for a CPA Firm's Accounting and Auditing Practice* [QC section 20]. A system of quality control is broadly defined as a process to provide the firm with reasonable assurance that its personnel comply with applicable professional standards and the firm's standards of quality. [Footnote added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Effective Date

.60 This statement is effective for compilations and reviews of financial statements for periods ending on or after July 1, 1979. Paragraphs .01 to .23 and Appendix A [paragraph .61] and Appendix D [paragraph .64] are effective for financial statements submitted after December 31, 2000. [Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

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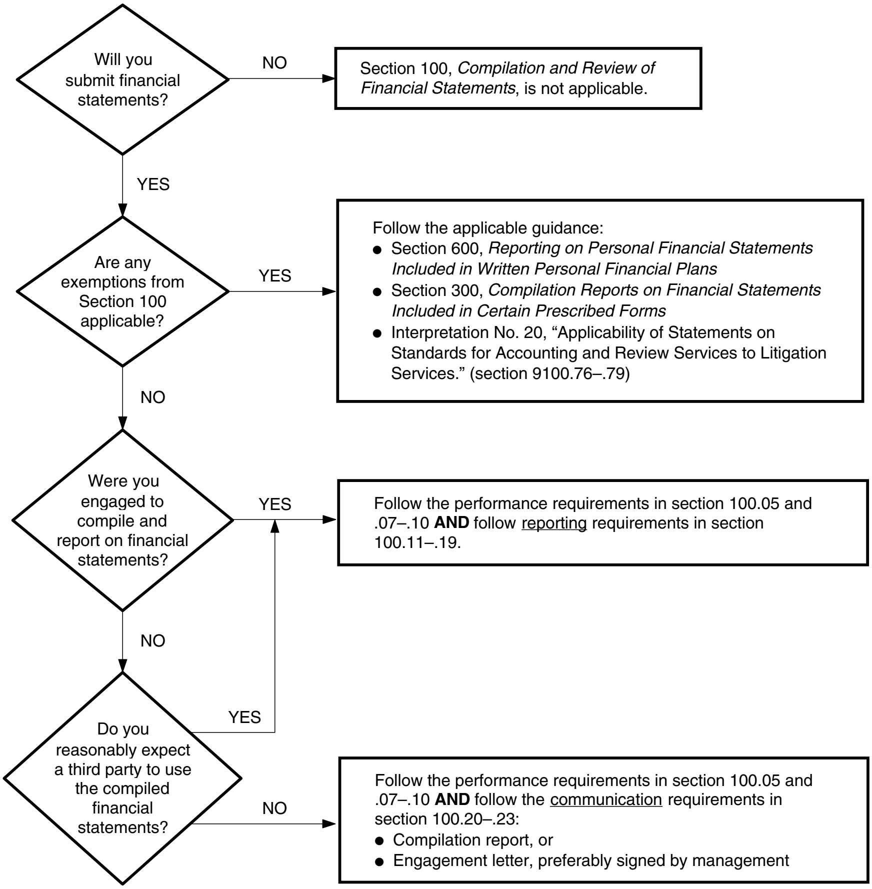
Appendix A

Compilation of Financial Statements



[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

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Appendix B

Review of Financial Statements—Illustrative Inquiries

The inquiries to be made in a review of financial statements are a matter of the accountant's professional judgment. In determining the appropiate inquiries, an accountant may consider (*a*) the nature and materiality of the items reflected in the financial statements, (*b*) the likelihood of a misstatement in the financial statements, (*c*) knowledge obtained during current and previous engagements, (*d*) the stated qualifications of the entity's accounting personnel, (*e*) the extent to which a particular item is affected by management's judgment, and (*f*) inadequacies in the entity's underlying financial data. The inquiries should generally be made of members of management with financial reporting and accounting responsibilities.

The following list of inquiries is for illustrative purposes only. These inquiries will not necessarily be applicable in every review engagement, nor are these inquiries meant to be all-inclusive. These illustrative inquiries are not intended to serve as a program or checklist to be utilized in performing a review engagement; rather, they address general areas where inquiries might be made in a review engagement. Also, the accountant may feel it necessary to make several inquiries in an effort to answer questions related to the issues addressed in these illustrative inquiries.

1. General

   a. Have there been any changes in the entity's business activities?

   b. Are there any unusual or complex situations that may have an effect on the financial statements (for example, business combinations, restructuring plans, or litigation)?

   c. What procedures are in place related to recording, classifying, and summarizing transactions and accumulating information related to financial statement disclosures?

   d. Have the financial statements been prepared in conformity with generally accepted accounting principles or, if appropriate, a comprehensive basis of accounting other than generally accepted accounting principles? Have there been any changes in accounting principles and methods of applying those principles?

   e. Have there been any instances of fraud or illegal acts within the entity?

   f. Have there been any allegations or suspicions that fraud or illegal acts might have occurred or might be occurring within the entity? If so, where and how?

   g. Are any entities, other than the reporting entity, commonly controlled by the owners? If so, has an evaluation been performed to determine whether those other entities should be consolidated into the financial statements of the reporting entity?

   h. Are there any entities other than the reporting entity in which the owners have significant investments (for example, variable interest entities)? If so, has an evaluation been performed to determine whether the reporting entity is the primary beneficiary related to the activities of these other entities?

   i. Have any significant transactions occurred or been recognized near the end of the reporting period?

2. Cash and cash equivalents
   a. Is the entity's policy regarding the composition of cash and cash equivalents in accordance with Financial Accounting Standards Board (FASB) Statement of Financial Accounting Standards No. 95, *Statement of Cash Flows* (paragraphs 7–10)? Has the policy been applied on a consistent basis?
   b. Are all cash and cash equivalents[1] accounts reconciled on a timely basis?
   c. Have old or unusual reconciling items between bank balances and book balances been reviewed and adjustments made where necessary?
   d. Has there been a proper cutoff of cash receipts and disbursements?
   e. Has a reconciliation of intercompany transfers been prepared?
   f. Have checks written but not mailed as of the financial statement date been properly reclassified into the liability section of the balance sheet?
   g. Have material bank overdrafts been properly reclassified into the liability section of the balance sheet?
   h. Are there compensating balances or other restrictions on the availability of cash and cash equivalents balances? If so, has consideration been given to reclassifying these amounts as noncurrent assets?
   i. Have cash funds been counted and reconciled with control accounts?
3. Receivables
   a. Has an adequate allowance for doubtful accounts been properly reflected in the financial statements?
   b. Have uncollectible receivables been written off through a charge against the allowance account or earnings?
   c. Has interest earned on receivables been properly reflected in the financial statements?
   d. Has there been a proper cutoff of sales transactions?
   e. Are there receivables from employees or other related parties? Have receivables from owners been evaluated to determine if they should be reflected in the equity section (rather than the asset section) of the balance sheet?
   f. Are any receivables pledged, discounted, or factored? Are recourse provisions properly reflected in the financial statements?
   g. Have receivables been properly classified between current and noncurrent?
   h. Have there been significant numbers of sales returns or credit memoranda issued subsequent to the balance sheet date?
   i. Is the accounts receivable subsidiary ledger reconciled to the general ledger account balance on a regular basis?

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[1] Cash and cash equivalents include all cash and highly liquid investments that are both (*a*) readily convertible to cash and (*b*) so near to maturity that they present insignificant risk of changes in value because of changes in interest rates, in accordance with paragraph 8 of FASB Statement No. 95, *Statement of Cash Flows*. [Footnote added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

4. Inventory
   - *a.* Are physical inventory counts performed on a regular basis, including at the end of the reporting period? Are the count procedures adequate to ensure an appropriate count? If not, how have amounts related to inventories been determined for purposes of financial statement presentation? If so, what procedures were used to take the latest physical inventory and what date was that inventory taken?
   - *b.* Have general ledger control accounts been adjusted to agree with the physical inventory count? If so, were the adjustments significant?
   - *c.* If the physical inventory counts were taken at a date other than the balance sheet date, what procedures were used to determine changes in inventory between the date of the physical inventory counts and the balance sheet date?
   - *d.* Were consignments in or out considered in taking physical inventories?
   - *e.* What is the basis of valuing inventory for purposes of financial statement presentation?
   - *f.* Does inventory cost include material, labor, and overhead where applicable?
   - *g.* Has inventory been reviewed for obsolescence or cost in excess of net realizable value? If so, how are these costs reflected in the financial statements?
   - *h.* Have proper cutoffs of purchases, goods in transit, and returned goods been made?
   - *i.* Are there any inventory encumbrances?
   - *j.* Is scrap inventoried and controlled?
5. Prepaid Expenses
   - *a.* What is the nature of the amounts included in prepaid expenses?
   - *b.* How are these amounts being amortized?
6. Investments
   - *a.* What is the basis of accounting for investments reported in the financial statements (for example, securities, joint ventures, or closely-held businesses)?
   - *b.* Are derivative instruments properly measured and disclosed in the financial statements? If those derivatives are utilized in hedge transactions, have the documentation or assessment requirements related to hedge accounting been met?
   - *c.* Are investments in marketable debt and equity securities properly classified as trading, available-for-sale, and held-to-maturity?
   - *d.* How were fair values of the reported investments determined? Have unrealized gains and losses been properly reported in the financial statements?
   - *e.* If the fair values of marketable debt and equity securities are less than cost, have the declines in value been evaluated to determine whether the declines are other-than-temporary?

f. For any debt securities classified as held-to-maturity, does management have the positive ability and intent to hold the securities until they mature? If so, have those debt securities been properly measured?

g. Have gains and losses related to disposal of investments been properly reflected in the financial statements?

h. How was investment income determined? Is investment income properly reflected in the financial statements?

i. Has appropriate consideration been given to the classification of investments between current and noncurrent?

j. For investments made by the reporting entity, have consolidation, equity, or cost method accounting requirements been considered?

k. Are any investments encumbered?

7. Property and Equipment

a. Are property and equipment items properly stated at depreciated cost or other proper value?

b. When was the last time a physical inventory of property and equipment was taken?

c. Are all items reflected in property and equipment held for use? If not, have items that are held for sale been properly reclassified from property and equipment?

d. Have gains or losses on disposal of property and equipment been properly reflected in the financial statements?

e. What are the criteria for capitalization of property and equipment? Have the criteria been consistently and appropriately applied?

f. Are repairs and maintenance costs properly reflected as an expense in the income statement?

g. What depreciation methods and rates are utilized in the financial statements? Are these methods and rates appropriate and applied on a consistent basis?

h. Are there any unrecorded additions, retirements, abandonments, sales, or trade-ins?

i. Does the entity have any material lease agreements? If so, have those agreements been properly evaluated for financial statement presentation purposes?

j. Are there any asset retirement obligations associated with tangible long-lived assets? If so, has the recorded amount of the related asset been increased because of the obligation and is the liability properly reflected in the liability section of the balance sheet?

k. Has the entity constructed any of its property and equipment items? If so, have all components of cost been reflected in measuring these items for purposes of financial statement presentation, including, but not limited to, capitalized interest?

l. Has there been any significant impairment in value of property and equipment items? If so, has any impairment loss been properly reflected in the financial statements?

m. Are any property and equipment items mortgaged or otherwise encumbered? If so, are these mortgages and encumbrances properly reflected in the financial statements?

8. Intangibles and Other Assets
   a. What is the nature of the amounts included in other assets?
   b. Do these assets represent costs that will benefit future periods? What is the amortization policy related to these assets? Is this policy appropriate?
   c. Have other assets been properly classified between current and noncurrent?
   d. Are intangible assets with finite lives being appropriately amortized?
   e. Are the costs associated with computer software properly reflected as intangible assets (rather than property and equipment) in the financial statements?
   f. Are the costs associated with goodwill (and other intangible assets with indefinite lives) properly reflected as intangible assets in the financial statements? Has amortization ceased related to these assets?
   g. Has there been any significant impairment in value of these assets? If so, has any impairment loss been properly reflected in the financial statements?
   h. Are any of these assets mortgaged or otherwise encumbered?
9. Accounts and Short-Term Notes Payable and Accrued Liabilities
   a. Have significant payables been reflected in the financial statements?
   b. Are loans from financial institutions and other short-term liabilities properly classified in the financial statements?
   c. Have significant accruals (for example, payroll, interest, provisions for pension and profit-sharing plans, or other postretirement benefit obligations) been properly reflected in the financial statements?
   d. Has a liability for employees' compensation for future absences been properly accrued and disclosed in the financial statements?
   e. Are any liabilities collateralized or subordinated? If so, are those liabilities disclosed in the financial statements?
   f. Are there any payables to employees and related parties?
10. Long-Term Liabilities
   a. Are the terms and other provisions of long-term liability agreements properly disclosed in the financial statements?
   b. Have liabilities been properly classified between current and noncurrent?
   c. Has interest expense been properly accrued and reflected in the financial statements?
   d. Is the company in compliance with loan covenants and agreements? If not, is the noncompliance properly disclosed in the financial statements?
   e. Are any long-term liabilities collateralized or subordinated? If so, are these facts disclosed in the financial statements?
   f. Are there any obligations that, by their terms, are due on demand within one year from the balance sheet date? If so, have these obligations been properly reclassified into the current liability section of the balance sheet?

11. Income and Other Taxes
    - *a.* Do the financial statements reflect an appropriate provision for current and prior-year income taxes payable?
    - *b.* Have any assessments or reassessments been received? Are there tax authority examinations in process?
    - *c.* Are there any temporary differences between book and tax amounts? If so, have deferred taxes on these differences been properly reflected in the financial statements?
    - *d.* Do the financial statements reflect an appropriate provision for taxes other than income taxes (for example, franchise, sales)?
    - *e.* Have all required tax payments been made on a timely basis?
12. Other Liabilities, Contingencies, and Commitments
    - *a.* What is the nature of the amounts included in other liabilities?
    - *b.* Have other liabilities been properly classified between current and noncurrent?
    - *c.* Are there any guarantees, whether written or verbal, whereby the entity must stand ready to perform or is contingently liable related to the guarantee? If so, are these guarantees properly reflected in the financial statements?
    - *d.* Are there any contingent liabilities (for example, discounted notes, drafts, endorsements, warranties, litigation, and unsettled asserted claims)? Are there any potential unasserted claims? Are these contingent liabilities, claims, and assessments properly measured and disclosed in the financial statements?
    - *e.* Are there any material contractual obligations for construction or purchase of property and equipment or any commitments or options to purchase or sell company securities? If so, are these facts clearly disclosed in the financial statements?
    - *f.* Is the entity responsible for any environmental remediation liability? If so, is this liability properly measured and disclosed in the financial statements?
    - *g.* Does the entity have any agreement to repurchase items that previously were sold? If so, have the repurchase agreements been taken into account in determining the appropriate measurements and disclosures in the financial statements?
    - *h.* Does the entity have any sales commitments at prices expected to result in a loss at the consummation of the sale? If so, are these commitments properly reflected in the financial statements?
    - *i.* Are there any violations, or possible violations, of laws or regulations the effects of which should be considered for financial statement accrual or disclosure?
13. Equity
    - *a.* What is the nature of any changes in equity accounts during each reporting period?
    - *b.* What classes of stock (other ownership interests) have been authorized?
    - *c.* What is the par or stated value of the various classes of stock (other ownership interests)?

d. Do amounts of outstanding shares of stock (other ownership interests) agree with subsidiary records?

e. Have pertinent rights and privileges of ownership interests been properly disclosed in the financial statements?

f. Does the entity have any mandatorily redeemable ownership interests? If so, have these ownership interests been evaluated so that a proper determination has been made related to whether these ownership interests should be measured and reclassified to the liability section of the balance sheet? Are redemption features associated with ownership interests clearly disclosed in the financial statements?

g. Have dividend (distribution) and liquidation preferences related to ownership interests been properly disclosed in the financial statements?

h. Do disclosures related to ownership interests include any applicable call provisions (prices and dates), conversion provisions (prices and rates), unusual voting rights, significant terms of contracts to issue additional ownership interests, or any other unusual features associated with the ownership interests?

i. Are syndication fees properly reflected in the financial statements as a reduction of equity (rather than an asset)?

j. Have any stock options or other stock compensation awards been granted to employees or others? If so, are these options or awards properly measured and disclosed in the financial statements?

k. Has the entity made any acquisitions of its own stock? If so, are the amounts associated with these reacquired shares properly reflected in the financial statements as a reduction in equity? Is the presentation in accordance with applicable state laws?

l. Are there any restrictions or appropriations on retained earnings or other capital accounts? If so, are these restrictions or appropriations properly reflected in the financial statements?

14. Revenue and Expenses

a. What is the entity's revenue recognition policy? Is the policy appropriate? Has the policy been consistently applied and appropriately disclosed?

b. Are revenues from sales of products and rendering of services recognized in the appropriate reporting period (that is, when the products have been delivered and when the services have been performed)?

c. Were any sales recorded under a "bill and hold" arrangement? If yes, have the criteria been met to record the transaction as a sale?

d. Are purchases and expenses recognized in the appropriate reporting period (that is, matched against revenue) and properly classified in the financial statements?

e. Do the financial statements include discontinued operations, items that might be considered extraordinary, or both? If so, are amounts associated with discontinued operations, extraordinary items, or both properly displayed in the income statement?

f. Does the entity have any gains or losses that would necessitate the display of comprehensive income (for example, gains/losses on available-for-sale securities or cash flow hedge derivatives)? If so, have these items been properly displayed within comprehensive income (rather than included in the determination of net income)?

15. Other

a. Have events occurred subsequent to the balance sheet date that would require adjustment to, or disclosure in, the financial statements?

b. Have actions taken at stockholders, directors, committees of directors, or comparable meetings that affect the financial statements been reflected in the financial statements?

c. Are significant estimates and material concentrations (for example, customers or suppliers) properly disclosed in the financial statements?

d. Are there plans or intentions that may materially affect the carrying amounts or classification of assets and liabilities reflected in the financial statements?

e. Have there been material transactions between or among related parties (for example, sales, purchases, loans, or leasing arrangements)? If so, are these transactions properly disclosed in the financial statements?

f. Are there uncertainties that could have a material impact on the financial statements? Is there any change in the status of previously disclosed material uncertainties? Are all uncertainties, including going concern matters, that could have a material impact on the financial statements properly disclosed in the financial statements?

g. Are barter or other nonmonetary transactions properly recorded and disclosed?

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered and amended, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

.63

Appendix C

Compilation of Financial Statements—Illustrative Engagement Letter

[*Appropriate Salutation*]

This letter is to confirm our understanding of the terms and objectives of our engagement and the nature and limitations of the services we will provide.

We will perform the following services:

1. We will compile, from information you provide, the annual and interim balance sheets and related statements of income, retained earnings, and cash flows of XYZ Company for the year 19XX. We will not audit or review such financial statements. Our report on the annual financial statements of XYZ Company is presently expected to read as follows:

> I (we) have compiled the accompanying balance sheet of XYZ Company as of December 31, 19XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statement on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.
>
> A compilation is limited to presenting in the form of financial statements information that is the representation of management. We have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

Our report on your interim financial statements, which statements will omit substantially all disclosures, will include an additional paragraph that will read as follows:

> Management has elected to omit substantially all of the disclosures required by generally accepted accounting principles. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

If, for any reason, we are unable to complete the compilation of your financial statements, we will not issue a report on such statements as a result of this engagement.

2. We will also . . . (discussion of other services).

Our engagement cannot be relied upon to disclose errors, fraud, or illegal acts that may exist. However, we will inform the appropriate level of management of any material errors that come to our attention and any fraud or illegal acts that come to our attention, unless they are clearly inconsequential.

Our fees for these services . . . .

We shall be pleased to discuss this letter with you at any time.

If the foregoing is in accordance with your understanding, please sign the copy of this letter in the space provided and return it to us.*

Sincerely yours,

____

[*Signature of accountant*]

Acknowledged:

XYZ Company

____

President

____

Date

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

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* Some accountants prefer not to obtain an acknowledgment, in which case their letter would omit the paragraph beginning, "If the foregoing . . . " and the spaces for the acknowledgment. The first paragraph of their letter might begin as follows: "This letter sets forth our understanding of the terms and objectives of our engagement . . . . "

.64

Appendix D

Compilation of Financial Statements Not Intended for Third Party Use—Illustrative Engagement Letter

[*Appropriate Salutation*]

This letter is to confirm our understanding of the terms and objectives of our engagement and the nature and limitations of the services we will provide.

We will perform the following services:

1. We will compile, from information you provide, the [*monthly, quarterly, or other frequency*] financial statements of XYZ Company for the year 20XX. A compilation is limited to presenting in the form of financial statements information that is the representation of management. We will not audit or review the financial statements and, accordingly, will not express an opinion or any other form of assurance on them. The financial statements will not be accompanied by a report.

Based upon our discussions with you, these statements are for management's use only and are not intended for third-party use.

Material departures from generally accepted accounting principles (GAAP) or other comprehensive basis of accounting (OCBOA) may exist and the effects of those departures, if any, on the financial statements may not be disclosed. In addition substantially all disclosures required by GAAP or OCBOA may be omitted. (The accountant may wish to identify known departures.) Notwithstanding these limitations, you represent that you have knowledge about the nature of the procedures applied and the basis of accounting and assumptions used in the preparation of the financial statements that allows you to place the financial information in the proper context. Further, you represent and agree that the use of the financial statements will be limited to members of management with similar knowledge.

The financial statements are intended solely for the information and use of [*include list of specified members of management*] and are not intended to be and should not be used by any other party—[*optional*].

2. We will also [*discussion of other services—optional*].

Our engagement cannot be relied upon to disclose errors, fraud, or illegal acts that may exist. However, we will inform the appropriate level of management of any material errors that come to our attention and any fraud or illegal acts that come to our attention, unless clearly inconsequential.

We are not independent with respect to [*name of entity—if applicable*].

The other data accompanying the financial statements are presented only for supplementary analysis purposes and will be compiled from information that is the representation of management, without audit or review, and we do not express an opinion or any other form of assurance on such data—[*if applicable*].

In view of the limitations described above, you agree not to take or assist in any action seeking to hold us liable for damages due to any deficiency in the financial statements we prepare and you agree to hold us harmless from any liability and related legal costs arising from any third-party use of the financial statements in contravention of the terms of this agreement. [*optional*]

Our fees for these services [*fill in*].

Should you require financial statements for third-party use, we would be pleased to discuss with you the requested level of service. Such engagement would be considered separate and not deemed to be part of the services described in this engagement letter.

If the foregoing is in accordance with your understanding, please sign the copy of this letter in the space provided and return it to us.[*]

Sincerely yours,

____

[*Signature of accountant*]

Accepted and agreed to:

XYZ Company

____

Title

____

Date

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

[*] Some accountants prefer not to obtain an acknowledgment, in which case their letter would omit the paragraph beginning, "If the foregoing . . . " and the spaces for the acknowledgment. The first paragraph of their letter might begin as follows: "This letter sets forth our understanding of the terms and objectives of our engagement . . . . "

.65

Appendix E

Review of Financial Statements—Illustrative Engagement Letter

[*Appropriate Salutation*]

This letter is to confirm our understanding of the terms and objectives of our engagement and the nature and limitations of the services we will provide.

We will perform the following services:

1. We will review the balance sheet of XYZ Company as of December 31, 19XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. Our review will consist primarily of inquiries of company personnel and analytical procedures applied to financial data and we will require a representation letter from management. A review does not contemplate obtaining an understanding of internal control or assessing control risk, tests of accounting records and responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit. Thus, a review does not provide assurance that we will become aware of all significant matters that would be disclosed in an audit. Our engagement cannot be relied upon to disclose errors, fraud, or illegal acts that may exist. However, we will inform the appropriate level of management of any material errors that come to our attention and any fraud or illegal acts that come to our attention, unless they are clearly inconsequential. We will not perform an audit of such financial statements, the objective of which is the expression of an opinion regarding the financial statements taken as a whole, and, accordingly, we will not express such an opinion on them.

Our report on the financial statements is presently expected to read as follows:

> We have reviewed the accompanying balance sheet of XYZ Company as of December 31, 19XX, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management of XYZ Company.
>
> A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.
>
> Based on our review, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with generally accepted accounting principles.

If, for any reason, we are unable to complete our review of your financial statements, we will not issue a report on such statements as a result of this engagement.

2. We will also . . . (discussion of other services).

Our fees for these services. . . .

We shall be pleased to discuss this letter with you at any time.

If the foregoing is in accordance with your understanding, please sign the copy of this letter in the space provided and return it to us.

Sincerely yours,

____

[*Signature of accountant*]

Acknowledged:

XYZ Company

____

President

____

Date

[Paragraph renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.66

Appendix F

Review of Financial Statements—Illustrative Representation Letter

A review of financial statements consists principally of inquiries of company personnel and analytical procedures applied to financial data. As part of a review of financial statements, the accountant is required to obtain a written representation from his or her client to confirm the oral representations made to the accountant. The introductory paragraph should specify the financial statements and periods covered by the accountant's review report, for example, "balance sheets of XYZ Company as of December 31, 20X1 and 20X0, and the related statements of income and retained earnings, and cash flows for the years then ended."

If matters exist that should be disclosed to the accountant, they should be indicated by listing them following the representation. For example, if an event subsequent to the date of the balance sheet has been disclosed in the financial statements, the subsequent events paragraph could be modified as follows: "To the best of our knowledge and belief, except as discussed in Note X to the financial statements, no events have occurred. . . ." Similarly, in appropriate circumstances, item 4 could be modified as follows: "The company has no plans or intentions that may materially affect the carrying value or classification of assets and liabilities, except for our plans to dispose of Segment A, as disclosed in Note X to the financial statements, which are discussed in the minutes of the December 7, 20X1, meeting of the board of directors."

The following representation letter is included for illustrative purposes only. The accountant may decide, based on the circumstances of the review engagement or the industry in which the entity operates, that other matters should be specifically included in the letter or that some of the representations included in the illustrative letter are not necessary.

(Date [*No earlier than the date of the Accountant's Report*])

(To the Accountant)

We are providing this letter in connection with your review of the (identification of financial statements) of (name of entity) as of (dates) and for the (periods of review) for the purpose of expressing limited assurance that there are no material modifications that should be made to the statements in order for them to be in conformity with generally accepted accounting principles. We confirm that we are responsible for the fair presentation in the financial statements of financial position, results of operations, and cash flows in conformity with generally accepted accounting principles.

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.[1]

We confirm, to the best of our knowledge and belief, (as of [*a date no earlier than the date of review report, see section 100.29*]), the following representations made to you during your review.

---

[1] The qualitative discussion of materiality used in this letter is adapted from Financial Accounting Standards Board Statement of Financial Accounting Concepts No. 2, *Qualitative Characteristics of Accounting Information.*

1. The financial statements referred to above are fairly presented in conformity with generally accepted accounting principles.
2. We have made available to you all:
   a. Financial records and related data.
   b. Minutes of the meetings of stockholders, directors, and committees of directors, or summaries of actions of recent meetings for which minutes have not yet been prepared.
3. There are no material transactions that have not been properly recorded in the accounting records underlying the financial statements.
4. We have no plans or intentions that may materially affect the carrying amounts or classification of assets and liabilities.
5. There are no material losses (such as from obsolete inventory or purchase or sales commitments) that have not been properly accrued or disclosed in the financial statements.
6. There are no:
   a. Violations or possible violations of laws or regulations, whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency
   b. Unasserted claims or assessments that our lawyer has advised us are probable of assertion that must be disclosed in accordance with Financial Accounting Standards Board (FASB) Statement No. 5 [AC section C59], *Accounting for Contingencies*.[2]
   c. Other material liabilities or gain or loss contingencies that are required to be accrued or disclosed by FASB Statement No. 5
7. The company has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets, nor has any asset been pledged as collateral.
8. We have complied with all aspects of contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
9. The following have been properly recorded or disclosed in the financial statements:
   a. Related party transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees, and amounts receivable from or payable to related parties.
   b. Guarantees, whether written or oral, under which the company is contingently liable.
   c. Significant estimates and material concentrations known to management that are required to be disclosed in accordance with the AICPA's Statement of Position 94-6, *Disclosure of Certain Significant Risks and Uncertainties*. [Significant estimates are estimates at the balance sheet date that could change materially with the next year. Concentrations refer to volumes of business, revenues, available sources of supply, or markets or geographic

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[2] If management has not consulted a lawyer regarding litigation, claims, and assessments, the representation might be worded as follows:

> We are not aware of any pending or threatened litigation, claims, or assessments or unasserted claims or assessments that are required to be accrued or disclosed in the financial statements in accordance with Financial Accounting Standards Board Statement No. 5 [AC section C59], *Accounting for Contingencies*, and we have not consulted a lawyer concerning litigation, claims, or assessments.

areas for which events could occur that would significantly disrupt normal finances within the next year.]

[*Add additional representations that are unique to the entity's business or industry. See below for additional illustrative representations.*]

10. To the best of our knowledge and belief, no events have occurred subsequent to the balance-sheet date and through the date of this letter that would require adjustment to or disclosure in the aforementioned financial statements.

11. We have responded fully and truthfully to all inquiries made to us by you during your review.

____
(Name of Owner or Chief Executive Officer and Title)

____
(Name of Chief Financial Officer and Title, where applicable)

The following additional representations may be appropriate in certain situations. This list of additional representations is not intended to be all-inclusive. In drafting a representation letter, the effects of other applicable pronouncements should be considered.

- The financial statements disclose all of the matters of which we are aware that are relevant to the entity's ability to continue as a going concern, including significant conditions and events, and our plans.
- We have reviewed long-lived assets to be held and used or to be disposed of for impairment in accordance with FASB Statement No. 144, *Accounting for Impairment or Disposal of Long-Lived Assets*, whenever events or changes in circumstances have indicated that the carrying amount of assets might not be recoverable, and have appropriately recorded the adjustment.
- We have tested goodwill and indefinite-lived intangibles for impairment in accordance with FASB Statement No. 142, *Goodwill and Other Intangible Assets*, and, when an asset has been impaired, we have appropriately recorded the adjustment to the carrying value of the impaired asset.
- Debt securities that have been classified as held-to-maturity have been so classified due to our intent to hold such securities to maturity and our ability to do so. All other debt securities have been classified as available-for-sale or trading.
- We consider the decline in value of debt or equity securities classified as either available-for-sale or held-to-maturity to be temporary.
- Receivables reported in the financial statements represent valid claims against debtors for sales or other charges arising on or before the balance-sheet date and have been appropriately reduced to their estimated net realizable value.
- We believe that the carrying amounts of all material assets will be recoverable.

- All agreements to repurchase assets previously sold have been properly disclosed.
- We have made provisions for losses to be sustained in the fulfillment of, or from the inability to fulfill, sales commitments.

See Statement on Auditing Standards No. 85, *Management Representations*, Appendix B, "Additional Illustrative Representations" [AU section 333.17], for other representations that may be appropriate from management relating to matters specific to the entity's business or industry.

[Paragraph renumbered and amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

[.67]

Appendix G

Rule 201 of the AICPA Code of Professional Conduct [ET section 201.01]

[Paragraph renumbered and deleted by the issuance of Statement on Standards for Accounting and Review Services No. 8, October 2000. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002. Paragraph subsequently renumbered by the issuance of Statement on Standards for Accounting and Review Services No. 10, May 2004.]

.68

Appendix H

Analytical Procedures the Accountant May Consider Performing When Conducting a Review of Financial Statements

Analytical procedures are designed to identify relationships and individual items that appear to be unusual and that may reflect a material misstatement of the financial statements. The analytical procedures performed in a review of financial statements are a matter of the accountant's professional judgment. In determining the appropriate analytical procedures, an accountant may consider (*a*) the nature and materiality of the items reflected in the financial statements, (*b*) the likelihood of a misstatement in the financial statements, (*c*) knowledge obtained during current and previous engagements, (*d*) the stated qualifications of the entity's accounting personnel, (*e*) the extent to which a particular item is affected by management's judgment, and (*f*) inadequacies in the entity's underlying financial data.

The following list of analytical procedures is for illustrative purposes only. These analytical procedures will not necessarily be applicable in every review engagement, nor are these analytical procedures meant to be all-inclusive. These illustrative analytical procedures are not intended to serve as a program or checklist to be utilized in performing a review engagement. Examples of analytical procedures an accountant may consider performing in a review of financial statements include:

- Comparing financial statements with statements for comparable prior period(s).
- Comparing current financial information with anticipated results, such as budgets or forecasts (for example, comparing tax balances and the relationship between the provision for income taxes and pretax income in the current financial information with corresponding information in (*a*) budgets, using expected rates, and (*b*) financial information for prior periods).[1]
- Comparing current financial information with relevant nonfinancial information.
- Comparing ratios and indicators for the current period with expectations based on prior periods, for example, performing gross profit analysis by product line and operating segment using elements of the current financial information and comparing the results with corresponding information for prior periods. Examples of key ratios and indicators are the current ratio, receivables turnover or days' sales outstanding, inventory turnover, depreciation to average fixed assets, debt to equity, gross profit percentage, net income percentage, and plant operating rates.

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[1] The accountant should exercise caution when comparing and evaluating current financial information with budgets, forecasts, or other anticipated results because of the inherent lack of precision in estimating the future and the susceptibility of such information to manipulation and misstatement by management to reflect desired results. [Footnote added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

- Comparing ratios and indicators for the current period with those of entities in the same industry.
- Comparing relationships among elements in the current financial information with corresponding relationships in the financial information of prior periods, for example, expense by type as a percentage of sales, assets by type as a percentage of total assets, and percentage of change in sales to percentage of change in receivables.

Analytical procedures may include such statistical techniques as trend analysis or regression analysis and may be performed manually or with the use of computer-assisted techniques.

In addition, the accountant may find the guidance in SAS No. 56, *Analytical Procedures* [AU section 329], as amended, useful in conducting a review of financial statements.

[Paragraph added, effective for reviews of financial statements for periods ending on or after December 15, 2004, by Statement on Standards for Accounting and Review Services No. 10.]

[The next page is 3351.]

AR Section 9100

Compilation and Review of Financial Statements: Accounting and Review Services Interpretations of Section 100

1. Omission of Disclosures in Reviewed Financial Statements

.01 *Question*—Paragraphs 16 through 18 of SSARS No. 1 [section 100.16–.18], *Compilation and Review of Financial Statements*, provides guidance to the accountant when a departure from generally accepted accounting principles relates to the omission of substantially all disclosures in the financial statements that he has compiled. Paragraph 45 of SSARS No. 1 [section 100.45] states that, in all other circumstances, an accountant should consider whether modification of his standard report is adequate to disclose a departure from generally accepted accounting principles. When a departure from generally accepted accounting principles relates to the omission of substantially all disclosures in financial statements that the accountant has reviewed, is disclosure of such omission in a separate paragraph of the accountant's report similar to the example in paragraph 18 of SSARS No. 1 [section 100.18] an adequate modification of his report?

.02 *Interpretation*—No. The guidance in paragraphs 16 through 18 of SSARS No. 1 [section 100.16–.18] only applies when financial statements that the accountant has *compiled* omit substantially all of the disclosures required by generally accepted accounting principles or another comprehensive basis of accounting. Because of the reporting requirements of SSARS No. 1 [section 100], an accountant ordinarily would not accept an engagement to review financial statements that omit substantially all of the disclosures required by generally accepted accounting principles. When an accountant who undertakes to *review* financial statements subsequently finds that his client declines to include substantially all required disclosures, his review report should include the disclosures omitted from the statements. However, if the information required to be disclosed has not been determined by management or is not known as the result of the accountant's procedures, the accountant is not required to determine the specific information that should be disclosed. In that circumstance, the accountant's report should specifically identify the nature of the omitted disclosures.

[Issue Date: December, 1979; Revised: November, 2002; Revised: May, 2004.]

2. Financial Statements Included in SEC Filings

.03 *Question*—Statements on Standards for Accounting and Review Services are applicable to the unaudited financial statements or other unaudited financial information of nonpublic entities (see definition in paragraph 4 of SSARS No. 1 [section 100.04], as amended by footnote 2 of paragraph 1 of SSARS No. 2 [section 200.01]. Unaudited financial statements of some entities that are nonpublic are occasionally included in documents filed with the Securities and Exchange Commission. For example, a nonpublic entity may be required to file unaudited financial statements in connection with the issuance of stock to an employee stock purchase plan or in connection with the sale of certain limited partnership units. Do the reporting requirements of SSARS No. 1 [section 100] apply in those circumstances?

.04 *Interpretation*—Deciding whether an entity is public or nonpublic for purposes of determining the applicability of SSARS No. 1 [section 100] should involve consideration of all relevant facts and the application of professional judgment. Professional standards do not eliminate the need for the exercise of professional judgment, since rules and definitions, no matter how carefully drawn, seldom cover every eventuality.

.05 In the circumstances described in this question, the accountant might note that the definition of a nonpublic entity contained in SSARS No. 1 [section 100], developed from the definition of a publicly traded company in APB Opinion No. 28 [AC section I73.101], differs from the definition of a nonpublic enterprise in FASB Statement No. 21, which excludes any entity "that is required to file financial statements with the Securities and Exchange Commission." This might lead the accountant to consider the significant responsibilities placed on independent accountants by the various securities acts. He might conclude that the users of unaudited financial statements included in documents filed with the SEC have objectives, needs, and expectations different from those of users of the unaudited financial statements of nonpublic entities that are not included in such filings. He might also conclude that communication with those users, because of the significance they attach to the regulatory and disciplinary responsibilities of the SEC, is not enhanced by including a compilation or review report in a document filed with the SEC, and might responsibly decide that the guidance in Statements on Auditing Standards is more appropriate in those circumstances.

[Issue Date: December, 1979.]

3. Reporting on the Highest Level of Service

.06 *Question*—Paragraphs 4 and 8 of SSARS No. 1 [section 100.04 and .08], *Compilation and Review of Financial Statements*, recognize that an accountant may consider it necessary to perform other accounting services to enable him to compile financial statements. Paragraph 2 of SSARS No. 1 [section 100.02] provides that when an accountant performs more than one service with respect to the financial statements of an entity he should issue the report that is appropriate for the highest level of service rendered. Does paragraph 2 of SSARS No. 1 [section 100.02] require the accountant to evaluate the extent of other accounting services he has performed in a compilation engagement to report on financial statements and to decide whether a review report should be issued instead of a compilation report?

.07 *Interpretation*—No. SSARS No. 1 [section 100] requires the accountant to issue a report whenever he completes and reports on a compilation or performs a review of the financial statements of a nonpublic entity. The statement that the accountant should issue a report that is appropriate for the highest level of service rendered is intended to make clear that if, for example, the accountant has both reported on compiled financial statements and reviewed the financial statements that he was engaged to review, he would need to issue only a review report.

.08 SSARS No. 1 [section 100] imposes no requirement for the accountant to "upgrade" his report because he has performed other accounting services. However, the accountant may wish to evaluate whether, as a result of performing such services, he is in a position to issue a review report when he was engaged only to report on a compilation. In such circumstances, he may wish to discuss the matter with his client and they may decide to revise their understanding regarding the nature of the services to be rendered.

.09 *Question*—An entity may wish to engage an accountant to report on compiled financial statements each month and also to review the financial statements of the entity for a quarterly or an annual period. May an accountant issue a compilation report on the monthly financial statements and a review report on quarterly or annual financial statements for a period ending on the same date as one of the monthly financial statements?

.10 *Interpretation*—Yes. An accountant may accept an engagement to report on compiled financial statements for an interim period and an engagement to review the financial statements for another period that ends on the same date, provided he complies with the applicable standards for each engagement.

.11 *Question*—An accountant who has been engaged to report on a compilation or review of the financial statements of an entity may also be requested to perform a higher level of service with respect to the same financial statements. Is the acceptance of such an engagement appropriate?

.12 Interpretation—Yes. SSARS No. 1 [section 100] does not prohibit the accountant from accepting an engagement to perform a higher level of service with respect to financial statements that have been previously compiled or reviewed.

[Issue Date: December, 1979; Revised: October, 2000.]

4. Discovery of Information After the Date of the Accountant's Report

.13 *Question*—Paragraph 48 of SSARS No. 1 [section 100.48], *Compilation and Review of Financial Statements*, states that the accountant may wish to consider the guidance in section 561 of Statement on Auditing Standards No. 1 [AU section 561] in determining an appropriate course of action when he becomes aware, subsequent to the date of his report on compiled or reviewed financial statements, that facts may have existed at that date which might have caused him to believe that information supplied by the entity was incorrect, incomplete, or otherwise unsatisfactory had he then been aware of such facts. What factors would the accountant ordinarily consider in determining an appropriate course of action and how would his judgments be affected by the nature of the service he had provided?

.14 *Interpretation*—Determining an appropriate course of action in the circumstances addressed in paragraph 48 of SSARS No. 1 [section 100.48] requires the careful exercise of professional judgment. Two factors that the accountant might consider in making this decision are:

a. *The reliability of the information.* If the information is of such a nature and from such a source that the accountant would have obtained additional or revised information during the course of his compilation or performed additional procedures during the course of his review, the accountant ordinarily would discuss the information with his client and consider the results of that discussion in determining what other action, if any, to take. The nature and extent of any procedures applied by the accountant relative to the reliability of the information would be similar to those that he would have applied had he become aware of the information during the course of his engagement. If the accountant believes that the information is reliable and that it existed at the date of his report, and if the information indicates that the financial statements, his report, or both need revision, the accountant ordinarily would conclude that persons known to be relying on or likely to rely on the financial statements should be notified in an appropriate manner.

b. *The existence of persons known to be relying on or likely to rely on the financial statements*. The compiled or reviewed financial statements of nonpublic entities may be distributed to persons who are not otherwise informed about the entity's financial position, results of operations, and cash flows. In evaluating the likelihood that such persons are currently relying on or likely to rely on the financial statements, the accountant should consider the time elapsed since the financial statements were issued. Although a compilation report does not express any form of assurance on the financial statements, it would seldom be appropriate for an accountant to conclude, simply because his responsibilities were limited to a compilation service, that notification of third party users in the absence of notification by the client is not required when the accountant knows that the financial statements should be revised.

.15 As indicated in both paragraph 48 of SSARS No. 1 [section 100.48] and, more explicitly, in section 561.02 of SAS No. 1 [AU section 561.02], the accountant should consider consulting with his attorney.

[Issue Date: November, 1980; Revised: November, 2002; Revised: May, 2004.]

5. Planning and Supervision

.16 *Question*—Rule 201C [ET section 201.01C] states: "Adequately plan and supervise the performance of professional services." Although Statement on Auditing Standards No. 22 [AU section 311], *Planning and Supervision*, deals with these matters in the context of an audit in accordance with generally accepted auditing standards, SSARS No. 1 [section 100] does not provide specific guidance for the planning and supervision of a compilation or review engagement. In the absence of specific guidance on planning and supervision in SSARS No. 1 [section 100], is an accountant required to follow the guidance provided in SAS No. 22 [AU section 311] in the context of a compilation or review engagement for a nonpublic entity?

.17 *Interpretation*—No. Statements on Auditing Standards do not govern engagements to compile or review financial statements of a nonpublic entity. However, an accountant may wish to consider SAS No. 22 [AU section 311] or other reference sources, such as textbooks and articles, when he needs additional information on planning and supervision.

[Issue Date: August, 1981; Revised: November, 2002.]

6. Withdrawal From Compilation or Review Engagement

.18 *Question*—Paragraph 47 of SSARS No. 1 [section 100.47] states: "If the accountant believes that modification of his standard report is not adequate to indicate the deficiencies in the financial statements taken as a whole, he should withdraw from the compilation or review engagement and provide no further services with respect to those financial statements." Under what circumstances would the accountant ordinarily conclude that it is necessary to withdraw from a compilation or review engagement?

.19 *Interpretation*—Modification of the accountant's standard report as described in paragraph 46 of SSARS No. 1 [section 100.46] ordinarily should be adequate to indicate the deficiencies in the financial statements taken as a whole. However, in some circumstances, likely to be rare and unusual, the nature, extent, and probable effect of the departures from generally accepted accounting principles or an other comprehensive basis of accounting might cause the accountant to question whether the departures were undertaken with the intention of misleading those who might reasonably be expected to use such financial statements. In those circumstances, withdrawal from the compilation or review engagement might be necessary; however, the accountant ordinarily would not make a decision to withdraw when the client agreed that the effects of the departures should be determined and disclosed in the accountant's report.

.20 As an illustration, the client may have entered into a number of leasing arrangements that might be required to be capitalized under FASB Statement No. 13 [AC section L10]. The client may not wish to capitalize such leases and may not have determined the effect of this departure from GAAP. However, the client may be willing to disclose in the financial statements information such as the nature of the leased property, the payments required under the leases, and other important terms of the leases. In those circumstances, the accountant is not likely to conclude that the departure was undertaken with the intention of misleading users, even though the effect of the departure is not quantified in the financial statements or the accountant's report.

.21 On the other hand, the client may have failed, for example, to make provision for doubtful accounts and probable sales returns in the face of significant adverse business and economic conditions and may be unwilling to acknowledge that an adjustment should be considered. This might cause the accountant to question whether other information provided by the client is incorrect, incomplete, or otherwise unsatisfactory. Also, the accountant's general knowledge of the entity's business and related matters might lead him to conclude that this position indicates an intention of misleading users, particularly if the effects of the departure are not determined.

.22 The accountant would also withdraw from the compilation or review engagement when the financial statements, including disclosures, are not revised and the client refuses to accept the modified standard report that the accountant believes is appropriate.

[Issue Date: August, 1981; Revised: November, 2002; Revised: May, 2004.]

7. Reporting When There Are Significant Departures From Generally Accepted Accounting Principles

.23 *Question*—When the financial statements include significant departures from generally accepted accounting principles or an other comprehensive basis of accounting, may the accountant modify his standard report under paragraph 46 of SSARS No. 1 [section 100.46] to include a statement that the financial statements are not in conformity with generally accepted accounting principles or an other comprehensive basis of accounting?

.24 *Interpretation*—No. Including such a statement in the accountant's compilation or review report would be tantamount to expressing an adverse opinion on the financial statements taken as a whole. Such an opinion can be expressed only in the context of an audit engagement. Furthermore, such a statement in a review report would confuse users because it would contradict the expression of limited assurance required by paragraph 38(*e*) of SSARS No. 1 [section 100.38(*e*)].

.25 However, footnote 23 to paragraph 46 of SSARS No. 1 [section 100.46, footnote 23] indicates that the accountant is not precluded from emphasizing in a separate paragraph of his report a matter regarding the financial statements. The accountant may wish, therefore, to emphasize the limitations of the financial statements in a separate paragraph of his compilation or review report, depending on his assessment of the possible dollar magnitude of the effects of the departures, the significance of the affected items to the entity, the pervasiveness and overall impact of the misstatements, and whether disclosure has been made of the effects of the departures. Such separate paragraph, which would follow the other modifications of his report (see illustrations in paragraph 46 of SSARS No. 1 [section 100.46]), might read as follows:

> Because the significance and pervasiveness of the matters discussed above makes it difficult to assess their impact on the financial statements taken as a whole, users of these financial statements should recognize that they might reach different conclusions about the company's financial position, results of operations, and cash flows if they had access to revised financial statements prepared in conformity with generally accepted accounting principles.

.26 Inclusion of such a separate paragraph in the accountant's compilation or review report is not a substitute for disclosure of the specific departures or the effects of such departures when they have been determined by management or are known as a result of the accountant's procedures. In this connection, see the interpretation entitled "Omission of Disclosures in Reviewed Financial Statements" (paragraphs .01 and .02).

[Issue Date: August, 1981; Revised: November, 2002; Revised: May, 2004.]

8. Reports on Specified Elements, Accounts, or Items of a Financial Statement

.27 *Question*—Paragraph 49 of SSARS No. 1 [section 100.49] provides guidance when the basic financial statements are accompanied by information presented for supplementary analysis purposes. However, a nonpublic entity may wish to engage an accountant to issue a review or compilation report on a separate presentation of specified elements, accounts, or items of a financial statement or to report the results of applying agreed-upon procedures to specified elements, accounts, or items of a financial statement. Do SSARS apply in such circumstances?

.28 *Interpretation*—No. SSARS provide guidance concerning the standards and procedures applicable to compilations and reviews of financial statements. Presentations of specified elements, accounts, or items of a financial statement are not financial statements.

Although SSARS do not apply, an accountant who assists his or her client in preparing such a presentation should comply with the principles of professional conduct, *General Standards* [ET section 201]. If the practitioner is concerned that his or her name may be associated with such presentation, the practitioner may issue a disclaimer similar to the wording in paragraph 3 of SSARS No. 1 [section 100.03] indicating that such presentation has not been audited, reviewed, or compiled by the practitioner and, accordingly, no opinion or any other form of assurance is being expressed.

In addition, Statement on Auditing Standards (SAS) No. 62, *Special Reports*, [AU section 623] and Interpretations thereof provide guidance with respect to reporting on such presentations when the engagement is intended to result in the expression of an audit opinion. SSAE No. 10, *Attestation Standards: Revision and Recodification*, chapter 2, *Agreed-Upon Procedures Engagements* [AT section 201], provides guidance with respect to reporting on the results of applying agreed-upon procedures to specified elements, accounts, or items of a financial statement. SSAE No. 10, chapter 1, *Attest Engagements* [AT section

101], provides guidance with respect to reporting on such presentations when the accountant is engaged to express moderate assurance in a review report.

[Issue Date: November, 1981; Revised: January, 2001; Revised: November, 2002; Revised: September, 2003; Revised: May, 2004.]

9. Reporting When Management Has Elected to Omit Substantially All Disclosures

.29 *Question*—Paragraph 18 of SSARS No. 1 [section 100.18] illustrates a form of standard report appropriate when compiled financial statements omit substantially all disclosures. The third paragraph of that illustrative report begins with this sentence: "Management has elected to omit substantially all of the disclosures . . . required by generally accepted accounting principles." Paragraph 16 of SSARS No. 1 [section 100.16] requires the accountant to disclose in his report the fact that compiled financial statements omit substantially all disclosures but does not state that there is a need to indicate that "management has elected" to omit such disclosures. May the accountant modify the wording of his report, for example, to state that "Management has not included substantially all of the disclosures . . ." or "The Company has not included substantially all of the disclosures . . ."?

.30 *Interpretation*—Use of the language in the third paragraph of the standard report in paragraph 18 of SSARS No. 1 [section 100.18] is encouraged; it was designed to impress upon management and the users of financial statements that omission of substantially all disclosures is the entity's decision, not the accountant's. However, provided the report clearly indicates this, the wording "Management has elected to omit" may be modified. Language such as "These financial statements do not include substantially all of the disclosures . . ." should not be used because some might infer that the decision to omit disclosures was the accountant's.

[Issue Date: May, 1982.]

10. Reporting on Tax Returns

.31 *Question*—May an accountant comply with a request from a nonpublic entity to issue a compilation or review report on financial information contained in a tax return, as in Form 1040, *U.S. Individual Income Tax Return*, or Form 1120, *U.S. Corporation Income Tax Return*, or in an information return, as in Form 990, *Return of Organization Exempt from Income Tax*, Form 1065, *U.S. Partnership Return of Income*, or Form 5500, *Return of Employee Benefit Plan*?

.32 *Interpretation*—SSARS No. 1 [section 100] imposes no requirement on an accountant to report on financial information contained in a tax return. The fact that a return is subsequently used for a purpose other than submission to taxing authorities does not affect that exception. However, an accountant may decide to accept an engagement to issue a compilation or review report on such a return. In that case, he must comply with the applicable performance and reporting standards.

[Issue Date: November, 1982.]

11. Reporting on Uncertainties

.33 *Question*—Paragraph 45 of SSARS No. 1 [section 100.45] requires an accountant to consider modification of the standard compilation or review report when he becomes aware of a departure from generally accepted accounting principles (which include adequate disclosure) that is material to the financial statements. What guidance should the accountant follow in evaluating the disclosure of an uncertainty?

.34 *Interpretation*—FASB Statement No. 5 [AC section C59], *Accounting for Contingencies*, Statement No. 47 [AC section C32], *Disclosure of Long-Term Obligations*, and other authoritative accounting literature provide guidance on disclosure of uncertainties. However, the accounting literature does not provide specific guidance on disclosure of uncertainties caused by concern about the entity's ability to continue as a going concern. In evaluating the disclosure of those uncertainties, the accountant should look to the guidance provided by paragraphs 10 and 11 of SAS No. 59 [AU section 341.10 and .11], *The Auditor's Consideration of an Entity's Ability to Continue as a Going Concern*.

.35 If the accountant believes that the disclosure of an uncertainty is inadequate, he should consider the guidance provided in paragraphs 45 to 47 [section 100.45–.47], and Interpretations 6 and 7 [see JofA, Aug. 81, pp. 111–112], of SSARS No. 1 (paragraphs .18–.26) in modifying his report.

.36 *Question*—If the accountant believes that the financial statements appropriately disclose an uncertainty that is not susceptible of reasonable estimation, is the accountant required to issue a compilation or review report with an explanatory paragraph, describing the matter giving rise to the uncertainty?

.37 *Interpretation*—No. Interpretation Nos. 6 and 7 [paragraphs .18 through .26] of SSARS No. 1 indicates that an accountant is not required to modify his compilation or review report for an uncertainty that is appropriately disclosed in the financial statements.

.38 Although not a requirement, an accountant may wish to draw attention to an uncertainty in an explanatory paragraph of his compilation or review report. If so, the following example may be useful:

> "As discussed in Note X, certain conditions indicate that the Company may be unable to continue as a going concern. The accompanying financial statements do not include any adjustments to the financial statements that might be necessary should the Company be unable to continue as a going concern."

.39 *Question*—Paragraph 16 of SSARS No. 1 [section 100.16] allows the accountant, when he is requested to do so, to compile financial statements that omit substantially all of the disclosures required by GAAP, provided his report clearly indicates the omission and the client's decision to omit the disclosures was not, to the accountant's knowledge, undertaken with the intention of misleading users of the statements. Paragraph 17 [section 100.17] states that disclosure of the use of a comprehensive basis of accounting other than GAAP can never be omitted. Should disclosure of an uncertainty be considered so significant that it also could never be omitted?

.40 *Interpretation*—No. Paragraph 17 of SSARS No. 1 [section 100.17] requires disclosure of the use of a comprehensive basis of accounting other than GAAP in an attached footnote, in a note on the face of the financial statements, or in the accountant's report because a user has a right to expect, in the absence of evidence to the contrary, that the financial statements are prepared in conformity with *generally accepted* accounting principles. As to all other matters, the user is adequately warned of the limitations of the financial statements by the report language suggested in paragraph 18 of SSARS No. 1 [section 100.18] (as amended by SSARS No. 5).

[Issue Date: December, 1982; Revised: November, 2002; Revised: May, 2004.]

12. Reporting on a Comprehensive Basis of Accounting Other Than Generally Accepted Accounting Principles

.41 *Question*—Footnote 6 to paragraph 4 of SSARS No. 1 [section 100.04, footnote 6] states that "reference to generally accepted accounting principles in this statement includes, where applicable, another comprehensive basis of accounting." What modifications to the standard compilation or review report are required when financial statements are prepared on another comprehensive basis of accounting?

.42 *Interpretation*—When financial statements are prepared in accordance with a comprehensive basis of accounting other than generally accepted accounting principles, the footnotes ordinarily would state the basis of presentation and describe how that basis differs from generally accepted accounting principles. If such disclosures are made, the standard forms of compilation and review reports included in SSARS No. 1 [section 100] can be used. The reports should be modified to appropriately identify the accompanying financial statements.[1]

.43 When an accountant compiles and reports on financial statements that are presented in accordance with a comprehensive basis of accounting other than generally accepted accounting principles and that omit substantially all disclosures, paragraph 17 of SSARS No. 1 [section 100.17] requires disclosure of the basis of accounting. This disclosure may be in an attached footnote or in a note on the face of the financial statements. If disclosure is not made as part of the financial statements, modification of the accountant's compilation report would be required. For example, the following sentence could be added to the first paragraph of the standard compilation report: "The financial statements have been prepared on the accounting basis used by the Company for Federal income tax purposes, which is a comprehensive basis of accounting other than generally accepted accounting principles."

.44 *Question*—Although SSARS No. 1 [section 100] permits an accountant to compile or review financial statements prepared in conformity with a comprehensive basis of accounting other than generally accepted accounting principles, all the report examples in SSARS are for financial statement presentations in conformity with GAAP. What are appropriate compilation and review reports for other comprehensive bases of accounting?

.45 *Interpretation*—The following examples are offered.

Compilation, Full Disclosure—Cash Basis

I (we) have compiled the accompanying statement of assets and liabilities arising from cash transactions of XYZ Company as of December 31, 19XX, and the related statement of revenue collected and expenses paid for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

Compilation, Omission of Substantially All Disclosures, With No Reference to Basis—Income Tax Basis

I (we) have compiled the accompanying statement of assets, liabilities, and equity—income tax basis of XYZ Company as of December 31, 19XX, and the

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[1] Refer to paragraph 7 of SAS No. 62 [AU section 623.07].

related statement of revenue and expense—income tax basis for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The financial statements have been prepared on the accounting basis used by the Company for Federal income tax purposes, which is a comprehensive basis of accounting other than generally accepted accounting principles.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

Management has elected to omit substantially all of the disclosures ordinarily included in financial statements prepared on the income tax basis of accounting. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the Company's assets, liabilities, equity, revenue, and expenses. Accordingly, these financial statements are not designed for those who are not informed about such matters.

Review—Income Tax Basis

I (we) have reviewed the accompanying statement of assets, liabilities, and equity—income tax basis of XYZ Company as of December 31, 19XX, and the related statement of revenue and expenses—income tax basis for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (we) do not express such an opinion.

Based on my (our) review, I am (we are) not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with the income tax basis of accounting, as described in Note X.

[Issue Date: December, 1982; Revised: November, 1992; Revised: October, 2000.]

13. Additional Procedures

.46 *Question*—Certain procedures, such as confirmation of receivables and observation of inventories, are customarily performed in an audit but not in compilation or review engagements. If an accountant performs such "auditing procedures" in connection with a compilation or review engagement, is he required to change the engagement to an audit?

.47 *Interpretation*—No. Paragraph 9 of SSARS No. 1 [section 100.09] states that in a compilation engagement there is no requirement "to verify, corroborate, or review information," but it does not preclude the accountant from making inquiries or performing additional procedures. Similarly, paragraph 25 of SSARS No. 1 [section 100.25] states that a review engagement "does not contemplate obtaining an understanding of internal control or assessing control risk, tests of accounting records and of responses to inquiries by obtaining corroborating evidential matter, and certain other procedures ordinarily performed during an audit." However, it also indicates that there may be circumstances when the accountant "should perform the additional procedures he deems necessary. . . ." These citations make it clear that the standards for performing compilations or reviews of financial statements do not preclude the accountant from performing procedures that he deems necessary or that his client requests.

.48 Paragraph 5 of SSARS No. 1 [section 100.05] does require the accountant to establish an understanding with the entity regarding the services to be performed, including "a description of the report the accountant expects to render," and this understanding establishes the terms and objectives of the engagement. When the accountant, in connection with a compilation or review engagement, plans to perform procedures that are customarily applied during an audit, he may wish to place additional importance on whether his understanding with the client should be in writing.[2]

.49 The wording of confirmation requests or other communications related to additional procedures performed in the course of a compilation or review engagement should not use phrases such as "as part of an *audit* of the financial statements" (emphasis supplied).

[Issue Date: March, 1983; Revised: October, 2000;
Revised: November, 2002; Revised: May, 2004.]

[14.] Reporting on Financial Statements When the Scope of the Accountant's Procedures Has Been Restricted

[.50–.53] [Withdrawn April, 1990 by the Accounting and Review Services Committee.]

15. Differentiating a Financial Statement Presentation From a Trial Balance

.54 *Question*—Paragraph 1 of SSARS No. 1 [section 100.01] states that the accountant should not submit unaudited financial statements of a nonpublic entity to his or her client or a third party unless, as a minimum, he or she complies with the provisions of SSARS No. 1 [section 100] applicable to a compilation engagement.

.55 What attributes should an accountant consider when differentiating a financial statement from a trial balance to determine if SSARS apply to the accounting services performed?

.56 *Interpretation*—The accountant should consider, among other matters, the following attributes when (1) determining whether a financial presentation is a financial statement or a trial balance and (2) modifying the presentation to eliminate features in the presentation that blur the distinction between a financial statement and a trial balance.

- Generally, a financial statement features the combination of similar general ledger accounts to create classifications or account groupings with corresponding subtotals and totals of dollar amounts. Some examples of these classifications or account groupings are "current assets," "long-term debt," and "revenues." In addition, contra accounts are generally netted against the related primary accounts in financial statement presentations (i.e., "Accounts Receivable Net of Allowance for Bad Debts"). In contrast, a trial balance consists of a listing of all of the general ledger accounts and their corresponding debit or credit balances.

[2] If the engagement is to compile financial statements not expected to be used by a third party, a written communication is required.

- Financial statements generally contain titles that identify the presentation as one intended to present financial position, results of operations, or cash flows. Typical titles for financial statements include:
  a. Balance Sheet
  b. Statement of Income or Statement of Operations
  c. Statement of Comprehensive Income
  d. Statement of Retained Earnings
  e. Statement of Cash Flows
  f. Statement of Changes in Owners' Equity
  g. Statement of Assets and Liabilities (with or without owners' equity accounts)
  h. Statement of Revenue and Expenses
  i. Statement of Financial Position
  j. Statement of Activities
  k. Summary of Operations
  l. Statement of Operations by Product Lines
  m. Statement of Cash Receipts and Disbursements

  Examples of typical titles for trial balance presentations are:
  a. Trial Balance
  b. Working Trial Balance
  c. Adjusted Trial Balance
  d. Listing of General Ledger Accounts

- The balance sheet in a set of financial statements segregates asset, liability, and owners' equity accounts and presents these three elements based on the following basic example equation:

  Assets = Liabilities + Owners' Equity

  The elements of the income statement and their relationship to net income are presented based on the following basic example equation:

  Revenues - Expenses + Gains - Losses = Net Income

  In a trial balance, no attempt is made to establish a mathematical relationship among the elements except that total debits equal total credits.

- The income statement in a set of financial statements generally contains a caption such as "Net Income" or "Net Revenues over Expenses" that identifies the net results of operations. Trial balance presentations generally do not contain similar captions.

- The balance sheet in a set of financial statements usually presents assets in the order of their liquidity and liabilities in the order of their maturity. In a trial balance, the accounts are generally listed in account number order as they appear in the general ledger.

- In a set of financial statements, the income statement articulates with the balance sheet because the net results of operations are added to or subtracted from opening retained earnings. In a trial balance, the net results of operations are generally not closed out to retained earnings.

.57 The accountant should use judgment when considering these attributes to determine whether the financial presentation constitutes a financial statement or a trial balance. When making this determination, the accountant should consider the preponderance of the attributes of the financial presentation. For example, a trial balance that contains one or two attributes of a financial statement may, in the accountant's judgment, still constitute a trial balance. When the presentation is deemed to be a financial statement and the accountant does not modify the presentation to conform with the attributes of a trial balance, the accountant, at a minimum, should compile the financial statements in accordance with SSARS No. 1 [section 100].

[Issue Date: September, 1990; Revised: October, 2000.]

[16.] Determining if the Accountant Has "Submitted" Financial Statements Even When Not Engaged to Compile or Review Financial Statements

[.58–.60] [Withdrawn by the issuance of Statement on Standards for Accounting and Review Services No. 7, November 1992.][3]

17. Submitting Draft Financial Statements

.61 *Question*—Accountants frequently submit draft financial statements (1) because information needed to complete a compilation or review of the financial statements will not be available until a later date or (2) to provide the client with the opportunity to read and analyze the financial statements prior to their final issuance. Is it permissible for the accountant to submit draft financial statements without intending to comply with the reporting provisions of SSARS No. 1 [section 100]?

.62 *Interpretation*—Except in those instances where the financial statements are not expected to be used by a third party, as permitted under paragraphs 20 through 23 of SSARS No. 1 [section 100.20–.23], an accountant should not submit draft financial statements without intending to submit those financial statements in final form accompanied by an appropriate compilation or review report prescribed by SSARS No. 1 [section 100]. However, as long as the accountant intends to submit the financial statements in final form and labels each page of draft financial statements with words such as "Draft," "Preliminary Draft," "Draft—Subject to Changes," or "Working Draft," the accountant is not required to comply with the reporting provisions of SSARS No. 1 [section 100] with respect to those draft financial statements. In the rare circumstance where the accountant intended to but never submitted final financial statements, the accountant may want to document the reasons why he or she was unable to submit those financial statements.

[Issue Date: September, 1990; Revised: October, 2000.]

18. Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions

.63 *Question*—An accountant may be asked to report on special-purpose financial statements prepared to comply with a contractual agreement[4] or

[3] [Footnote deleted by the issuance of Statement on Standards for Accounting and Review Services No. 7, November 1992.]

[4] A contractual agreement as discussed in this interpretation is an agreement between the client and one or more third parties other than the accountant.

regulatory provision that specifies a special basis of presentation.[5] In those circumstances, can the accountant issue a compilation or review report on those financial statements in accordance with SSARS No. 1 [section 100], *Compilation and Review of Financial Statements*?

.64 *Interpretation*—Yes. An accountant who is asked to report on special-purpose financial statements prepared to comply with a contractual agreement or regulatory provision that specifies a special basis of presentation may issue a compilation or review report on those financial statements in accordance with SSARS No. 1 [section 100] as described in this interpretation. This interpretation describes reporting on presentations based on contractual agreements or regulatory provisions that require a financial presentation that

a. does not constitute a complete presentation of the entity's assets, liabilities, revenues, or expenses, but is otherwise prepared in conformity with generally accepted accounting principles (GAAP) or an other comprehensive basis of accounting (OCBOA)[6]

or

b. is a prescribed basis of accounting that does not result in a presentation in conformity with GAAP or OCBOA.

Incomplete Presentation That is Otherwise in Conformity With GAAP or an OCBOA

.65 An entity may engage an accountant to compile or review a special-purpose financial presentation prepared in compliance with a contractual agreement or regulatory provision that does not constitute a complete presentation of the entity's assets, liabilities, revenues or expenses, but is otherwise prepared in conformity with GAAP or OCBOA. For example, a purchase agreement may require an entity to provide a schedule of net assets sold, measured in conformity with GAAP, but limited to the asset to be sold and liabilities to be transferred. Also, a governmental agency may require a schedule of revenues and certain expenses for an entity in which revenues and expenses are measured in conformity with GAAP, but expenses are defined to exclude certain items such as interest, depreciation, and income taxes. These special-purpose financial presentations should generally be considered as financial statements even though certain items may be excluded. Therefore, in such cases, the presentations would not be considered as presentations of a specified element, account, or item of a financial statement as discussed in paragraphs .27 through .28.

.66 Compiled or reviewed special-purpose financial statements prepared in accordance with a contractual agreement or regulatory provision that do not constitute a complete presentation of the entity's assets, liabilities, revenues or expenses, but are otherwise prepared in conformity with GAAP or OCBOA, should:

a. Include the disclosure of the basis of presentation in the notes to the financial statements.

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[5] When the contractual agreement or regulatory provision specifies the use of a prescribed form for which the accountant has been engaged to compile the financial statements included therein, the accountant should reference SSARS No. 3 [section 300], *Compilation Reports on Financial Statements Included in Certain Prescribed Forms*, for an alternative form of standard compilation report when the prescribed form calls for a departure from generally accepted accounting principles or another comprehensive basis of accounting.

[6] The term "comprehensive basis of accounting other than generally accepted accounting principles" is defined in SAS No. 62, *Special Reports*, paragraph 4 [AU section 623.04].

b. Differ from financial statements prepared in accordance with GAAP or OCBOA only to the extent necessary to meet the special purpose for which the presentation is prepared.

c. Contain similar informative disclosures when the presentation contains items that are the same as, or similar to, those contained in a full set of financial statements.

d. Include titles that avoid any implication that the special-purpose financial statements are intended to present financial position, results of operations, or cash flows.

.67 When reporting on compiled or reviewed special-purpose financial statements prepared in accordance with a contractual agreement or regulatory provision that does not constitute a complete presentation of the entity's assets, liabilities, revenues or expenses, but is otherwise prepared in conformity with GAAP or OCBOA, the accountant's report should be expanded to include two explanatory paragraphs with the following information. A(n):

First Additional Paragraph

- Explanation of what the presentation is intended to present and reference to a note to the financial statements that describes the basis of accounting. In a compilation engagement in which the entity chooses to omit substantially all of the disclosures and does not disclose in the financial statements the basis of presentation, the accountant should disclose the basis in the compilation report.
- Indication that the presentation is not intended to be a complete presentation of the entity's assets, liabilities, revenues, and expenses.[7]

Second Additional Paragraph

- A statement indicating that the report is intended solely for the information and use of the specified parties.[8]
- An identification of the specified parties to whom the use is restricted.
- A statement that the report is not intended to be and should not be used by anyone other than the specified parties.

Compilation of Special-Purpose Financial Presentation That is an Incomplete Presentation Prepared in Accordance With a Contractual Agreement but is Otherwise in Conformity With GAAP or OCBOA

(Note: The two paragraphs to be added to the standard compilation report are italicized.)

I (We) have compiled the accompanying statement of net assets sold of XYZ Company as of December 31, 19XX, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (We) have not audited or reviewed the accompanying statement and, accordingly do not express an opinion or any form of assurance on it.

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[7] If the basis of presentation is OCBOA, the paragraph should state that the basis of presentation is a comprehensive basis of accounting other than generally accepted accounting principles and that it is not intended to be a complete presentation of the entity's assets, liabilities, revenues, and expenses on the basis described.

[8] In some cases, restricted-use reports filed with regulatory agencies are required by law or regulation to be made available to the public as a matter of public record. Also, a regulatory agency as part of its oversight responsibility for an entity may require access to restricted-use reports in which they are not named as a specified party.

The accompanying statement was prepared to present the net assets of XYZ Company sold to ABC Company pursuant to the purchase agreement described in Note A, and is not intended to be a complete presentation of XYZ Company's assets and liabilities.

*This report is intended solely for the information and use of [*the specified parties*]*[9] *and is not intended to be and should not be used by anyone other than these specified parties.*

Review of Special-Purpose Financial Presentation That is an Incomplete Presentation Prepared in Accordance With a Regulatory Provision but is Otherwise in Conformity With GAAP or OCBOA

(Note: The two paragraphs to be added to the standard report are italicized. Also, because the report in this example will be filed with a regulatory agency and made available as a part of the public record, the report restriction is modified accordingly.)

I (We) have reviewed the accompanying statement of gross income and direct operating expenses of XYZ Company as of December 31, 19XX, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in this statement is the representation of management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the statement taken as a whole. Accordingly, I (We) do not express such an opinion.

The accompanying statement was prepared to present gross income and direct operating expenses of XYZ Company pursuant to the regulatory provision described in Note A, and is not intended to be a complete presentation of XYZ Company's gross income and expenses.

Based on my (our) review, I am (we are) not aware of any material modifications that should be made to the accompanying statement of gross income and direct operating expenses in order for it to be in conformity with generally accepted accounting principles.

*This report is intended solely for the information and use of [*the specified parties*] and is not intended to be and should not be used by anyone other than these specified parties.*

Presentation Prescribed in a Contractual Agreement That is Not in Conformity With GAAP or an OCBOA

.68 An entity may engage an accountant to compile or review a special-purpose financial presentation prepared in conformity with a basis of accounting prescribed in a contractual agreement that results in a presentation that is not in conformity with GAAP or OCBOA. For example, an acquisition agreement may require an entity to prepare financial statements in which certain assets, such as inventories and properties, are presented in conformity with a valuation basis, that is neither GAAP or OCBOA. Also, a loan agreement may require the borrower to prepare financial statements in which certain assets, such as receivables, inventories, and properties are presented on a basis specified in the agreement that is neither GAAP or OCBOA. In these

[9] The report may list the specified parties or refer the reader to the specified parties listed elsewhere in the report.

circumstances, the special-purpose financial presentations are not considered to be prepared in conformity with an OCBOA because the criteria used to prepare such financial statements do not meet the requirement of being "criteria having substantial support," even though the criteria are definite.

.69 Compiled or reviewed special-purpose financial statements prepared in conformity with a contractual agreement that is not in conformity with GAAP or OCBOA should:

(*a*) Include the disclosure of the basis of presentation in the notes to the financial statements.

(*b*) Contain similar informative disclosures when the presentation contains items that are the same as, or similar to, those contained in GAAP or OCBOA financial statements.

(*c*) Include titles that avoid any implication that the special-purpose financial statements are intended to present financial position, results of operations, or cash flows.

.70 When reporting on compiled or reviewed special-purpose financial statements prepared in accordance with a contractual agreement that does not conform to GAAP or OCBOA, the accountant's report should be expanded to include two explanatory paragraphs with the following information. A(n):

First Additional Paragraph

- Explanation of what the presentation is intended to present, reference to a note to the financial statements that describes the basis of presentation, and explanation that the presentation is not intended to be a presentation in conformity with generally accepted accounting principles. In a compilation engagement in which the entity chooses to omit substantially all of the disclosures and does not disclose in the financial statements the basis of presentation, the accountant should disclose the basis in the compilation report.
- Description of any significant interpretations made by management of the contractual agreement.

Second Additional Paragraph

- Statement that the report is intended solely for the information and use of [*the specified parties*] and is not intended to be and should not be used by anyone other than these specified parties.

.71 The accountant's standard review report includes a statement that he or she is not aware of any material modifications that should be made to the financial statements in order for them to be "in conformity with GAAP." However, when the accountant is engaged to report on a special-purpose financial presentation pursuant to a contractual agreement that results in a presentation that does not conform with GAAP or OCBOA, the accountant should modify the report to reference the basis of accounting prescribed by the contractual agreement referred to in the notes since the presentation is not intended to conform with GAAP.

.72 If the accountant becomes aware that the information the presentation is intended to present contains a departure from the basis of presentation described that is material to the financial statements, the accountant should consider whether modification of his or her report is adequate to disclose such departure. In those circumstances, the accountant should consider the guidance in paragraphs 45 through 47 of SSARS No. 1 [section 100.45–.47].

Compilation of Special-Purpose Financial Presentation Pursuant to an Acquisition Agreement That Results in a Presentation That is Not in Conformity With GAAP or OCBOA

(Note: The two paragraphs to be added to the standard compilation report are italicized.)

I(We) have compiled the special-purpose statement of assets and liabilities of XYZ Company as of December 31, 19XX and the related special-purpose statements of revenues and expenses and of cash flows for the year then ended in accordance with standards established by the American Institute of Certified Public Accountants.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (We) have not audited or reviewed the accompanying special-purpose financial statements and, accordingly, do not express an opinion or any form of assurance on them.

The accompanying special-purpose financial statements were prepared for the purpose of complying with the acquisition agreement between ABC Company and XYZ Company described in Note A, and are not intended to be a presentation in conformity with generally accepted accounting principles.

This report is intended for the information and use of the boards of directors and managements of XYZ Company and ABC Company and should not be used for any other purpose.

Review of Special-Purpose Financial Presentation Pursuant to a Contractual Agreement That Results in a Presentation That is Not in Conformity With GAAP or OCBOA

(Note: The two paragraphs to be added to the standard review report are italicized.)

I (We) have reviewed the accompanying special-purpose statement of assets and liabilities of XYZ Company as of December 31, 19XX and the related special-purpose statements of revenues and expenses and of cash flows for the year then ended in accordance with standards established by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (We) do not express such an opinion.

The accompanying special-purpose financial statements were prepared for the purpose of complying with Section 4 of a loan agreement between DEF Bank and XYZ Company as discussed in Note A, and are not intended to be a presentation in conformity with generally accepted accounting principles.

Based on my (our) review, I am (we are) not aware of any material modifications that should be made to the accompanying special-purpose financial statements in order for them to be in conformity with the basis of accounting described in Note A.

This report is intended solely for the information and use of the boards of directors and managements of XYZ Company and DEF Bank and should not be used for any other purpose.

[Issue Date: September, 1990; Revised: January, 2004; Revised: May, 2004.]

19. Reporting When Financial Statements Contain a Departure From Promulgated Accounting Principles That Prevents the Financial Statements From Being Misleading

.73 *Question*—Rule 203 [ET section 203.01] of the AICPA Code of Professional Conduct states:

> A member shall not (1) express an opinion or state affirmatively that the financial statements or other financial data of any entity are presented in conformity with generally accepted accounting principles or (2) state that he or she is not aware of any material modifications that should be made to such statements or data in order for them to be in conformity with generally accepted accounting principles, if such statements or data contain any departure from an accounting principle promulgated by bodies designated by Council to establish such principles that has a material effect on the statements or data taken as a whole. If, however, the statements or data contain such a departure and the member can demonstrate that due to unusual circumstances the financial statements or data would otherwise have been misleading, the member can comply with the rule by describing the departure, its approximate effects, if practicable, and the reasons why compliance with the principle would result in a misleading statement.

Paragraphs 45 through 47 of SSARS No. 1 [section 100.45–.47] do not address the Rule 203 [ET section 203.01] circumstances. When the circumstances contemplated by Rule 203 [ET section 203.01] are present, how should the accountant report on the information described in the rule?

.74 *Interpretation*—When the circumstances contemplated by Rule 203 [ET section 203.01] are present in a review engagement, the accountant's review report should include, in a separate paragraph or paragraphs, the information required by Rule 203 [ET section 203.01]. In such a case, the accountant would not modify the standard review report, except for the addition of the separate paragraph(s) that contains the information required by Rule 203 [ET section 203.01], unless there are other reasons to do so that are not associated with the departure from a promulgated principle.

.75 Rule 203 [ET section 203.01] does not apply to engagements to report on a compilation. Accordingly, when the accountant is reporting on a compilation engagement and is confronted with the circumstances contemplated by Rule 203 [ET section 203.01], the guidance in paragraphs 45 through 47 of SSARS No. 1 [section 100.45–.47] pertaining to departures from generally accepted accounting principles should be followed.

[Issue Date: February, 1991; Revised: October, 2000;
Revised: November, 2002; Revised: May, 2004.]

20. Applicability of Statements on Standards for Accounting and Review Services to Litigation Services

.76 *Question*—When are litigation services excluded from the applicability of SSARS?

.77 *Interpretation*—SSARS do not apply to financial statements submitted in conjunction with litigation services that involve pending or potential formal legal or regulatory proceedings before a "trier of fact"[10] in connection with the resolution of a dispute between two or more parties when the:

[10] A "trier of fact" in this section means a court, regulatory body, or government authority; their agents; a grand jury; or an arbitrator or mediator of the dispute. [Footnote renumbered by the revision to Interpretation No. 18, January 2004.]

(*a*) Service consists of being an expert witness.

(*b*) Service consists of being a "trier of fact" or acting on behalf of one.

(*c*) Accountant's work under the rules of the proceedings is subject to detailed analysis and challenge by each party to the dispute.

(*d*) Accountant is engaged by an attorney to do work that will be protected by the attorney's work product privilege and such work is not intended to be used for other purposes.

When performing such litigation services the accountant should comply with Rule 201, *General Standards* [ET section 201.01], of the AICPA Code of Professional Conduct.

.78 *Question*—When do SSARS apply to litigation service engagements?

.79 *Interpretation*—SSARS apply to litigation service engagements when the accountant:

a. Submits unaudited financial statements of a nonpublic entity that are the representation of management (owners) to others who under the rules of the proceedings do not have the opportunity to analyze and challenge the accountant's work, or

b. Is specifically engaged to submit, in accordance with SSARS, financial statements that are the representation of management (owners).

[Issue Date: May, 1991; Revised: October, 2000.]

21. Applicability of SSARS No. 1 When Performing Controllership or Other Management Services

.80 *Question*—An accountant is in the practice of public accounting and provides an entity with controllership or other management services that entail the submission of financial statements. Is the accountant required to follow the requirements of SSARS No. 1 [section 100]?

.81 *Interpretation*—If the accountant is in the practice of public accounting as defined by the AICPA's Code of Conduct [ET section 92.25] and is not a stockholder, partner, director, officer, or employee of the entity, the accountant is required to follow the performance and communication requirements of SSARS No. 1 [section 100], including any requirement to disclose a lack of independence.[11]

.82 If the accountant is in the practice of public accounting and is also a stockholder, partner, director, officer, or employee of the entity, the accountant may either (1) comply with the requirements of SSARS No. 1 [section 100], or (2) communicate, preferably in writing, the accountant's relationship to the entity (for example, stockholder, partner, director, officer, or employee).[12]

.83 The following is an example of the type of communication that may be used by the accountant:

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[11] If the compilation is not intended for third party use, SSARS No. 1 as amended by SSARS No. 8 [section 100] may be appropriate. [Footnote renumbered by the revision to Interpretation No. 18, January 2004.]

[12] The accountant should refer to Ruling No. 10, "Submission of Financial Statement by a Member in Public Practice," of ET section 291, *Ethics Rulings on General and Technical Standards* [ET section 291.019–.020], for additional guidance. [Footnote renumbered by the revision to Interpretation No. 18, January 2004.]

> The accompanying balance sheet of Company X as of December 31, 20XX, and the related statements of income and cash flows for the year then ended have been prepared by [*name of accountant*], CPA. I have prepared such financial statements in my capacity [*describe capacity, for example*, as a director] of Company X.

.84 If an accountant is not in the practice of public accounting, the issuance of a report under SSARS would be inappropriate; however, the above communication may be used.

[Issue Date: July, 2002.]

22. Use of "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included"

.85 *Question*—Can an accountant label notes to the financial statements "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included" when the client includes more than a few required disclosures?

.86 *Interpretation*—No. As discussed in paragraph 16 of SSARS No. 1 [section 100.16], when the entity wishes to include disclosures about only a few matters in the form of notes to the financial statements, such disclosures should be labeled "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included."

.87 When the financial statements include more than a few disclosures, this guidance is not appropriate. The omission of one or more notes, when substantially all other disclosures are presented, should be treated in a compilation or review report like any other departure from GAAP, and the nature of the departure and its effects, if known, should be disclosed.

.88 The label "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included" should not be used in situations where substantially all disclosures are included. The label "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included" is not intended to be used for the omission of (intentionally or unintentionally) one or more disclosures and the accountant should use his or her judgment in determining the appropriateness of the label.

[Issue Date: December, 2002.]

23. Applicability of Statements on Standards for Accounting and Review Services When an Accountant Engaged to Perform a Business Valuation Derives Information From an Entity's Tax Return

.89 *Question*—When an accountant is engaged to perform a business valuation of an entity, it may be necessary for the accountant to derive financial information to be used in that business valuation from the client's tax return. This is particularly true if the entity does not have audited, reviewed, or compiled financial statements. If an accountant derives financial information from an entity's tax return, and such information is presented as part of the business valuation report, do SSARS apply?

.90 *Interpretation*—No. As discussed in paragraph 4 of SSARS No. 1 [section 100.04], under the definition of a financial statement, "Financial forecasts, projections and similar presentations, and financial presentations included in tax returns are not financial statements for purposes of this Statement."

Therefore, even if the accountant has prepared the tax return, he or she has not prepared financial statements in accordance with SSARS and the financial information derived from the tax return and presented as part of a business valuation is not deemed to be submission of financial statements as contemplated by SSARS No. 1 [section 100].

.91 When an accountant, in the course of performing a business valuation engagement, derives financial information from the client's tax return, or another accountant's audited, reviewed, or compiled financial statements, or client-prepared financial statements, the accountant should refer to the source of the financial information and include an indication in the business valuation report that the accountant has not audited, reviewed, or compiled the financial information and that the accountant assumes no responsibility for the information. (See paragraph 3 of SSARS No. 1 [section 100.03].) The following is an example of wording that may be included in the business valuation report which incorporates the requirements of paragraph 3 of SSARS No. 1 [section 100.03]:

> In preparing our business valuation report, we have relied upon historical financial information provided to us by management and derived from [*refer to the appropriate source of the information, such as tax return, audit report issued by another auditor, and so on*]. This financial information has not been audited, reviewed, or compiled by us and accordingly we do not express an opinion or any form of assurance on this financial information.

.92 However, if the accountant submits financial statements in the course of performing a business valuation as defined in paragraph 4 of SSARS No. 1 [section 100.04], then, at a minimum, the accountant should comply with the provisions of SSARS applicable to a compilation engagement.

[Issue Date: August, 2003.]

24. Reference to the Country of Origin in a Review or Compilation Report

.93 *Question*—When issuing a review or compilation report, should there be a reference to the country of origin of the accounting principles used to prepare the financial statements, similar to the requirement when issuing audited financial statements?

.94 *Interpretation*—SSARS do not require the reference to the country of origin as review and compilation reports refer to the American Institute of Certified Public Accountants. However, there is no prohibition of the reference if the accountant believes it is appropriate under the circumstances to include it in the report.

[Issue Date: September, 2003.]

25. Omission of the Display of Comprehensive Income in a Compilation

.95 *Question*—When an element of comprehensive income is present, can the display of comprehensive income be omitted when issuing a compilation report with substantially all disclosures omitted?

.96 *Interpretation*—Yes. FASB Statement No. 130, *Reporting Comprehensive Income*, requires the display of comprehensive income when a full set of financial statements is presented in conformity with generally accepted accounting principles. However, the display of comprehensive income may be omitted by identifying the omission in the compilation report or engagement letter (SSARS No. 8, *Amendment to Statement on Standards for Accounting and Review Services No. 1*, Compilation and Review of Financial Statements [section 100]). The following is suggested modified wording (shown in *italic*) to the standard compilation report found in paragraph 18 of SSARS No. 1 [section 100.18]:

> Management has elected to omit substantially all the disclosures, the statement of cash flows, *and the display of comprehensive income* required by generally accepted accounting principles. If the omitted disclosures, the statement of cash flows, *and the display of comprehensive income* were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

.97 In addition, if the accountant issues a compilation report on financial statements that omit substantially all disclosures and the display of comprehensive income but include the statement of cash flows, the following is suggested modified wording (shown in *italic*) to the compilation report found in paragraph 18 of SSARS No. 1 [section 100.18]:

> Management has elected to omit substantially all the disclosures *and the display of comprehensive income* required by generally accepted accounting principles. If the omitted disclosures *and the display of comprehensive income* were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

.98 If the accountant compiles financial statements that include all disclosures but omit the display of comprehensive income, the omission should be treated as a departure from generally accepted accounting principles.

.99 Additionally, if an element of comprehensive income has not been computed, for example, unrealized gains and losses arising from investments in marketable securities classified as "available for sale" then the accountant should consider a departure from generally accepted accounting principles and follow the guidance in paragraphs 45 through 47 of SSARS No. 1 [section 100.45–.47].

[Issue Date: September, 2003; Revised: May, 2004.]

26. Communicating Possible Fraud and Illegal Acts to Management and Others

.100 *Question*—Paragraph 5 of SSARS No. 1 [section 100.05], *Compilation and Review of Financial Statements*, states that the accountant should establish an understanding with the entity, preferably in writing, regarding the services to be performed. The understanding should provide that the accountant will inform the appropriate level of management of any material errors that come to his or her attention and any fraud or illegal acts that come to his or her attention, unless they are clearly inconsequential. When, during the performance of a compilation or a review engagement, the accountant suspects that a fraud or an illegal act may have occurred, what steps should be taken in performing the required communication?

.101 *Interpretation*—When an accountant suspects that a fraud or an illegal act may have occurred,[13] the accountant communicates the matter, unless

[13] If the suspected fraud or illegal act extends to prior period financial statements, see Interpretation No. 4, "Discovery of Information After the Date of the Accountant's Report" [section 9100.13–.15].

clearly inconsequential, to an appropriate level of management. If the suspected fraud or illegal act involves senior management, the matter should be communicated to an individual or group at the highest level within the entity, such as the manager (owner) or the board of directors. When the suspected fraud or illegal act involves an owner of the business, the accountant should consider resigning from the engagement.[14] Additionally, the accountant should consider consulting with his or her legal counsel and insurance provider whenever fraud or an illegal act is suspected.

.102 The accountant need not perform additional procedures to ascertain whether fraud or an illegal act, in fact, occurred or the probability that fraud or an illegal act occurred. However, the accountant should consider the impact of the suspected matter on the accountant's ability to perform inquiries and other review procedures such as obtaining a management representation letter and keep in mind that the purpose of the review is to express limited assurance that there are no material modifications that should be made to the financial statements in order for the statements to be in conformity with generally accepted accounting principles.

.103 The disclosure of possible fraud or illegal act to parties other than the client's senior management ordinarily is not part of the accountant's responsibility and ordinarily would be precluded by the accountant's ethical or legal obligations of confidentiality. The accountant should recognize, however, that in the following circumstances a duty to disclose to parties outside of the entity may exist:

a. To comply with certain legal and regulatory requirements

b. To a successor accountant when the successor decides to communicate with the predecessor accountant in accordance with SSARS No. 4, *Communications Between Predecessor and Successor Accountants* [section 400], regarding acceptance of an engagement to compile or review the financial statements of a nonpublic entity

c. In response to a subpoena

Because potential conflicts between the accountant's ethical and legal obligations for confidentiality of client matters may be complex, the accountant may wish to consult with legal counsel before discussing such matters with parties outside the client.

[Issue Date: May, 2004.]

[The next page is 3401.]

[14] See Interpretation No. 6, "Withdrawal From Compilation or Review Engagement" [section 9100.18–.22], for guidance as to the circumstances under which the accountant would ordinarily conclude that it is necessary to withdraw from a compilation or review engagement.

AR Section 200

Reporting on Comparative Financial Statements

Issue date, unless otherwise indicated: October, 1979

.01 This statement establishes standards for reporting on comparative financial statements[1] of a nonpublic entity when financial statements of one or more periods presented have been compiled and reported on or reviewed in accordance with SSARS No. 1 [section 100].[2] [Revised, October 2000, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 8.]

.02 When comparative financial statements are presented, the accountant should issue an appropriate report(s) covering each period presented in accordance with the provisions of this statement.[3]

.03 Client-prepared financial statements of some periods that have not been audited, reviewed, or compiled may be presented on separate pages of a document that also contains financial statements of other periods on which the accountant has reported if they are accompanied by an indication by the client that the accountant has not audited, reviewed, or compiled those financial statements and that the accountant assumes no responsibility for them. Whenever the accountant becomes aware that financial statements of other periods that have not been audited, reviewed, or compiled have been presented in columnar form in a document with financial statements on which he has reported and that his name has been used or his report included in the document, he should advise his client that the use of his name or report is inappropriate and should consider what other actions might be appropriate, including consultation with his attorney.

.04 An accountant may modify his report with respect to one or more financial statements for one or more periods while issuing an unmodified report on the other financial statements presented.

.05 Compiled financial statements that omit substantially all of the disclosures required by generally accepted accounting principles[4] are not comparable to financial statements that include such disclosures. Accordingly, the

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[1] This statement supersedes Statement on Standards for Accounting and Review Services No. 1, paragraph 51 [section 100[.52]].

[2] For purposes of this statement, a nonpublic entity is any entity other than (*a*) one whose securities trade in a public market either on a stock exchange (domestic or foreign) or in the over-the-counter market, including securities quoted only locally or regionally, (*b*) one that makes a filing with a regulatory agency in preparation for the sale of any class of its securities in a public market, or (*c*) a subsidiary, corporate joint venture, or other entity controlled by an entity covered by (*a*) or (*b*). This statement amends SSARS No. 1, paragraph 4 [section 100.04], by substituting the foregoing definition of a nonpublic entity. The terms *financial statements*, *compilation*, and *review* are defined in paragraph 4 of SSARS No. 1 [section 100.04].

[3] [Footnote deleted to reflect the conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 8.]

[4] For purposes of this statement, reference to generally accepted accounting principles includes, where applicable, a comprehensive basis of accounting other than generally accepted accounting principles as defined in SAS No. 62, paragraph 4 [AU section 623.04].

accountant should not issue a report on comparative financial statements when statements for one or more, but not all, of the periods presented omit substantially all of the disclosures required by generally accepted accounting principles. (See paragraphs .29 and .30 for guidance on reporting on financial statements that previously did not omit substantially all of the disclosures required by generally accepted accounting principles.)

.06 Each page of the comparative financial statements compiled or reviewed by the accountant should include a reference such as "See Accountant's Report."

Definitions

.07 The following definitions apply for purposes of this statement:

Comparative financial statements. Financial statements of two or more periods presented in columnar form.

Continuing accountant. An accountant who has been engaged to audit, review, or compile and report on the financial statements of the current period and one or more consecutive periods immediately prior to the current period.

Updated report. A report issued by a continuing accountant that takes into consideration information that he becomes aware of during his current engagement and that re-expresses his previous conclusions or, depending on the circumstances, expresses different conclusions on the financial statements of a prior period as of the date of his current report.[5]

Reissued report. A report issued subsequent to the date of the original report that bears the same date as the original report. A reissued report may need to be revised for the effects of specific events; in these circumstances, the report should be dual-dated with the original date and a separate date that applies to the effects of such events.

Continuing Accountant's Standard Report

.08 A continuing accountant who performs the same or a higher level of service with respect to the financial statements of the current period should update his report on the financial statements of a prior period presented with those of the current period.[6] A continuing accountant who performs a lower level of service with respect to the financial statements of the current period should either (*a*) include as a separate paragraph of his report a description of the responsibility assumed for the financial statements of the prior period (see paragraphs .11 and .12) or (*b*) reissue his report on the financial statements of the prior period.

.09 Examples of a continuing accountant's standard report on comparative financial statements when the same level of service has been performed for both periods are presented below:

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[5] See paragraphs 11 and 38 of SSARS No. 1, as amended [section 100.11 and .38]. [Footnote revised, November 2002, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 9. Footnote revised, May 2004, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 10.]

[6] For purposes of this statement, a *review* is a higher level of service and a *compilation* is a lower level of service. When one of the periods is audited, see paragraphs .27 and .28.

Compilation Each Period

I (we) have compiled the accompanying balance sheets of XYZ Company as of December 31, 19X2 and 19X1, and the related statements of income, retained earnings, and cash flows for the years then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.

A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

February 1, 19X3

Review Each Period

I (we) have reviewed the accompanying balance sheets of XYZ Company as of December 31, 19X2 and 19X1, and the related statements of income, retained earnings, and cash flows for the years then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (we) do not express such an opinion.

Based on my (our) reviews, I am (we are) not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with generally accepted accounting principles.

March 1, 19X3

[As amended, effective for periods ending after December 15, 1993, by Statement on Standards for Accounting and Review Services No. 7.]

.10 An example of a continuing accountant's standard report on comparative financial statements for two periods when the financial statements of the current period have been reviewed and those of the prior period have been compiled is presented below:

I (we) have reviewed the accompanying balance sheet of XYZ Company as of December 31, 19X2, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. All information included in these financial statements is the representation of the management (owners) of XYZ Company.

A review consists principally of inquiries of company personnel and analytical procedures applied to financial data. It is substantially less in scope than an audit in accordance with generally accepted auditing standards, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, I (we) do not express such an opinion.

Based on my (our) review, I am (we are) not aware of any material modifications that should be made to the 19X2 financial statements in order for them to be in conformity with generally accepted accounting principles.

The accompanying 19X1 financial statements of XYZ Company were compiled by me (us). A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the 19X1 financial statements and, accordingly, do not express an opinion or any other form of assurance on them.

March 1, 19X3

[As amended, effective for periods ending after December 15, 1993, by Statement on Standards for Accounting and Review Services No. 7.]

.11 A continuing accountant who performs a compilation of the current-period financial statements and has previously reviewed one or more prior-period financial statements should report as indicated in either (*a*) or (*b*) below:

a. Issue a compilation report on the current-period financial statements that includes a description of the responsibility assumed for the financial statements of the prior period. The description should include the original date of the accountant's report and should also state that he has not performed any procedures in connection with that review engagement after that date.

b. Combine his compilation report on the financial statements of the current period with his reissued review report on the financial statements of the prior period or present them separately. The combined report should state that the accountant has not performed any procedures in connection with that review engagement after the date of his review report.

.12 An example of a paragraph that may be added to a compilation report on the current-period financial statements describing the responsibilities assumed when prior-period financial statements were reviewed is presented below:

The accompanying 19X1 financial statements of XYZ Company were previously reviewed by me (us) and my (our) report dated March 1, 19X2, stated that I was (we were) not aware of any material modifications that should be made to those statements in order for them to be in conformity with generally accepted accounting principles. I (we) have not performed any procedures in connection with that review engagement after the date of my (our) report on the 19X1 financial statements.

Continuing Accountant's Changed Reference to a Departure From Generally Accepted Accounting Principles

.13 During his current engagement, the accountant should be aware that circumstances or events may affect the prior-period financial statements presented, including the adequacy of informative disclosures. The accountant should consider the effects on his report on the prior-period financial statements of circumstances or events coming to his attention.

.14 When the accountant's report on the financial statements of the prior period contains a changed reference to a departure from generally accepted accounting principles,[7] his report should include a separate explanatory paragraph indicating—

[7] A changed reference includes the removal of a prior reference or the inclusion of a new reference.

a. The date of the accountant's previous report.

b. The circumstances or events that caused the reference to be changed.

c. When applicable, that the financial statements of the prior period have been changed.

.15 The following is an example of an explanatory paragraph appropriate when an accountant's report contains a changed reference to a departure from generally accepted accounting principles:

> In my (our) previous (compilation) (review) report dated March 1, 19X2, on the 19X1 financial statements, I (we) referred to a departure from generally accepted accounting principles because the company carried its land at appraised values. However, as disclosed in note X, the company has restated its 19X1 financial statements to reflect its land at cost in accordance with generally accepted accounting principles.

Predecessor's Compilation or Review Report

.16 A predecessor may reissue his report at the client's request if he is able to make satisfactory arrangements with his former client and if he complies with the provisions of paragraphs .20 to .24. However, a predecessor is not required to reissue his compilation or review report on the financial statements of a prior period. If he does not reissue his compilation or review report on the financial statements of a prior period, a successor should either (*a*) make reference to the report of the predecessor in accordance with the provisions of paragraphs .17 to .19 or (*b*) perform a compilation, review, or audit of the financial statements of the prior period and report on them accordingly.[8]

Predecessor's Compilation or Review Report Not Presented

.17 When the financial statements of a prior period have been compiled or reviewed by a predecessor whose report is not presented and the successor has not compiled or reviewed those financial statements, the successor should make reference in an additional paragraph(s) of his report on the current-period financial statements to the predecessor's report on the prior-period financial statements. This reference should include the following matters:

a. A statement that the financial statements of the prior period were compiled or reviewed by another accountant (other accountants).[9]

b. The date of his (their) report.

c. A description of the standard form of disclaimer or limited assurance, as applicable, included in the report.

d. A description or a quotation of any modifications of the standard report and of any paragraphs emphasizing a matter regarding the financial statements.

.18 When the predecessor reviewed the financial statements of the prior period, an example of the last paragraph of the successor's report is as follows:

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[8] [Footnote deleted by the issuance of Statement on Standards for Accounting and Review Services No. 4, December 1981.]

[9] The successor accountant should not name the predecessor accountant in his or her report; however, the successor accountant may name the predecessor accountant if the predecessor accountant's practice was acquired by, or merged with, that of the successor accountant. [As amended, effective May 2004, by Statement on Standards for Accounting and Review Services No. 11.]

> The 19X1 financial statements of XYZ Company were reviewed by other accountants whose report dated March 1, 19X2, stated that they were not aware of any material modifications that should be made to those statements in order for them to be in conformity with generally accepted accounting principles.

.19 When the predecessor compiled the financial statements of the prior period, an example of the last paragraph of the successor's report is as follows:

> The 19X1 financial statements of XYZ Company were compiled by other accountants whose report dated February 1, 19X2, stated that they did not express an opinion or any other form of assurance on those statements.

Predecessor's Compilation or Review Report Reissued

.20 Before reissuing a compilation or review report on the financial statements of a prior period, a predecessor should consider whether his report is still appropriate. In making this determination, the predecessor should consider (*a*) the current form and manner of presentation of the prior-period financial statements, (*b*) subsequent events not previously known, and (*c*) changes in the financial statements that require the addition or deletion of modifications to the standard report.

.21 A predecessor should perform the following procedures before reissuing his compilation or review report on the financial statements of a prior period:

a. Read the financial statements of the current period and the successor's report.

b. Compare the prior-period financial statements with those previously issued and with those of the current period.

c. Obtain a letter from the successor that indicates whether he is aware of any matter that, in his opinion, might have a material effect on the financial statements, including disclosures, reported on by the predecessor. The predecessor should not refer in his reissued report to this letter or to the report of the successor.

.22 If a predecessor becomes aware of information, including information about events or transactions occurring subsequent to the date of his previous report, that he believes may affect the prior-period financial statements or his report on them, he should (*a*) make inquiries or perform analytical procedures similar to those he would have performed if he had been aware of such information at the date of his report on the prior-period financial statements and (*b*) perform any other procedures he considers necessary in the circumstances. For example, the predecessor may wish to discuss this information with the successor or to review the working papers of the successor as they relate to the matters affecting the prior-period financial statements. If the predecessor decides, based on the information obtained, that his report on the prior-period financial statements should be revised, he should follow the guidance in paragraphs .14, .15, .23, and .24.

.23 A predecessor's knowledge of the current affairs of his former client is obviously limited in the absence of a continuing relationship. Consequently, when reissuing his report on the prior-period financial statements, a predecessor should use the date of his previous report to avoid any implication that he has performed procedures after that date other than those described in paragraphs .20 to .22. If the predecessor revises his report or if the financial statements are restated, he should dual-date his report (for example, "March 1, 19X1, except for note X, as to which the date is March 15, 19X2"). The predecessor's responsibility for events occurring subsequent to the completion of his engagement is limited to the specific event referred to in the note or otherwise disclosed. He should also obtain a written statement from the former client setting forth the information currently acquired and its effect on the prior-period financial statements and, if applicable, expressing an understanding of its effect on the predecessor's reissued report.

.24 If a predecessor is unable to complete the procedures described in paragraphs .20 to .23, he should not reissue his report and may wish to consult with his attorney regarding the appropriate course of action.

Changed Prior-Period Financial Statements

.25 When the financial statements of the prior period have been changed, either the predecessor or the successor should report on them as restated. If the predecessor accepts the reporting obligation, he should follow the guidance in paragraphs .20 to .24. If the successor reports on the financial statements, he should comply with the compilation or review standards in SSARS No. 1 [section 100] (or perform an audit) with respect to such restated prior-period financial statements and report on them accordingly. If a successor reports on the restated financial statements, he should not refer in his report to the predecessor's previously issued report.

.26 If the restatement does not involve a change in accounting principles or their application (for example, the correction of an error), the accountant may wish to include an explanatory paragraph in his report with respect to the restatement, but he should not otherwise modify his standard report provided the financial statements appropriately disclose such matters.

Reporting When One Period Is Audited

.27 Notwithstanding the provisions of paragraph .08, the accountant should follow the guidance in statements on auditing standards, which provide guidance on reporting on comparative financial statements when the current-period financial statements have been audited and those for one or more prior periods have been compiled or reviewed.

.28 When the current-period financial statements of a nonpublic entity have been compiled or reviewed and those of the prior period have been audited, the accountant should issue an appropriate compilation or review report on the current-period financial statements and either (*a*) the report on the prior period should be reissued or (*b*) the report on the current period should include as a separate paragraph an appropriate description of the responsibility assumed for the financial statements of the prior period. In the latter case, the separate paragraph should indicate (*a*) that the financial statements of the prior period were audited previously, (*b*) the date of the previous report, (*c*) the type of opinion expressed previously, (*d*) if the opinion was other than unqualified, the substantive reasons therefor, and (*e*) that no auditing procedures were performed after the date of the previous report. An example of such a separate paragraph is the following:

> The financial statements for the year ended December 31, 19X1, were audited by us (other accountants) and we (they) expressed an unqualified opinion on them in our (their) report dated March 1, 19X2, but we (they) have not performed any auditing procedures since that date.

Reporting on Financial Statements That Previously Did Not Omit Substantially All Disclosures

.29 An accountant who has compiled, reviewed, or audited financial statements that did not omit substantially all of the disclosures required by generally accepted accounting principles may subsequently be requested to compile statements for the same period that do omit substantially all of those disclosures when they are to be presented in comparative financial statements. Notwithstanding the provisions of SSARS No. 1, paragraph 2 [section 100.02], in these circumstances the accountant may report on comparative compiled financial statements that omit such disclosures if he includes in his report an additional paragraph indicating the nature of the previous service rendered with respect to those financial statements and the date of his previous report.

.30 An example of a report appropriate when prior-period financial statements that omit substantially all disclosures have been compiled from previously reviewed financial statements for the same period is presented below:

> I (we) have compiled the accompanying balance sheet of XYZ Company as of December 31, 19X2 and 19X1, and the related statements of income, retained earnings, and cash flows for the year then ended, in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.
>
> A compilation is limited to presenting in the form of financial statements information that is the representation of management (owners). I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or any other form of assurance on them.
>
> Management has elected to omit substantially all of the disclosures required by generally accepted accounting principles. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.
>
> The accompanying 19X1 financial statements were compiled by me (us) from financial statements that did not omit substantially all of the disclosures required by generally accepted accounting principles and that I (we) previously reviewed as indicated in my (our) report dated March 1, 19X2.
>
> February 1, 19X3

[As amended, effective for periods ending after December 15, 1993, by Statement on Standards for Accounting and Review Services No. 7.]

Change of Status—Public/Nonpublic Entity

.31 When reporting on comparative financial statements for either interim or annual periods, the current status of the entity should govern whether the accountant is guided by statements on auditing standards or statements on standards for accounting and review services. A previously issued report that is not appropriate for the current status of the entity should not be reissued or referred to in the report on the financial statements of the current period.

.32 For example, if the entity is a public entity in the current period and was a nonpublic entity in the prior period, a compilation or review report previously issued on the financial statements of the prior period should not be reissued or referred to in the report on the financial statements of the current and one or more prior periods.[10] If an entity is a nonpublic entity in the current period and was a public entity in the prior period, the annual financial statements of the prior period may have been audited.[11] In these circumstances, the accountant should refer to paragraph .28 for guidance on the appropriate method of reporting on the comparative financial statements.

Transition

[.33–.35] [Paragraphs deleted to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 8.]

Effective Date

.36 This statement will be effective for reports on comparative financial statements for periods ending on or after November 30, 1979. However, earlier application is encouraged for periods ending on or after July 1, 1979.

[The next page is 3421.]

[10] In these circumstances, the accountant should refer to statements on auditing standards for guidance on the appropriate method of reporting on the comparative financial statements.

[11] If an unaudited disclaimer of opinion was previously issued on the financial statements of the prior period, it should not be reissued or referred to in the report on the financial statements of the current period. In these circumstances, the accountant should comply with the compilation or review standards in SSARS No. 1 [section 100] (or perform an audit) and report accordingly on the financial statements of the prior period. (However, see also paragraphs .33 to .35 concerning reporting during the transition period.)

AR Section 9200

Reporting on Comparative Financial Statements: Accounting and Review Services Interpretations of Section 200

1. Reporting on Financial Statements That Previously Did Not Omit Substantially All Disclosures

.01 *Question*—Paragraph 29 of SSARS No. 2 [section 200.29], *Reporting on Comparative Financial Statements*, states that an accountant who has compiled, reviewed, or audited financial statements that do not omit substantially all of the disclosures required by generally accepted accounting principles may subsequently compile financial statements for the same period that do omit substantially all of those disclosures when they are to be presented in comparative financial statements. In these circumstances, SSARS No. 2 [section 200] requires the accountant's compilation report to include an additional paragraph indicating (*a*) the nature of the service rendered with respect to the financial statements that previously did not omit substantially all disclosures and (*b*) the date of his previous report.

.02 When the accountant has previously audited such financial statements, he may have issued a qualified opinion (see paragraphs 38 and 39 of SAS No. 58 [AU section 508.20–.21], *Reports on Audited Financial Statements*) or an adverse opinion (see paragraphs 67 to 69 of SAS No. 58) [AU section 508.58–.60], or he may have disclaimed an opinion (see paragraphs 70 to 72 of SAS No. 58 [AU section 508.61–.63]). What effect, if any, should this have on the accountant's report on the comparative compiled financial statements? Also, when the accountant has previously compiled or reviewed such financial statements, what effect should a modification to his compilation or review report (see paragraphs 45 to 47 of SSARS No. 1 [section 100.45–.47]) have on the accountant's report on the comparative compiled financial statements?

.03 *Interpretation*—If financial statements that omit substantially all disclosures are compiled from financial statements that the accountant has previously audited, his report on the comparative compiled financial statements should indicate whether he expressed a qualified or adverse opinion, or disclaimed an opinion, on the audited financial statements, and the substantive reasons therefor. Similarly, if the accountant issued a modified compilation or review report or a report containing any paragraphs emphasizing a matter regarding the financial statements (see paragraphs 45 to 47 of SSARS No. 1 [section 100.45–.47]) on financial statements that previously did not omit substantially all disclosures, the accountant's reference to that report in his report on the comparative compiled financial statements should include a description or a quotation of any modifications of the standard report and of any paragraphs emphasizing a matter regarding the financial statements.

.04 Statements on standards for accounting and review services do not require an accountant to modify the standard compilation or review report for an uncertainty or an inconsistency in the application of generally accepted accounting principles. When the accountant's report on comparative compiled financial statements that omit substantially all of the disclosures required by generally accepted accounting principles includes a reference to a previous audit report that includes an explanatory paragraph describing an uncertainty, users may assume, in the absence of an indication to the contrary, that the uncertainty has been resolved. Thus, in such circumstances, the accountant should consider the desirability of emphasizing the uncertainty in a separate paragraph of that portion of his report that relates to the financial statements for the current period.

[Issue Date: November, 1980; Revised: November, 2002; Revised: May, 2004.]

[The next page is 3441.]

AR Section 300

Compilation Reports on Financial Statements Included in Certain Prescribed Forms

Issue date, unless otherwise indicated: December, 1981

.01 The requirements of SSARS No. 1 [section 100] and SSARS No. 2 [section 200] are applicable when the unaudited financial statements of a nonpublic entity are included in a prescribed form. This statement amends SSARS No. 1 [section 100] and SSARS No. 2 [section 200] to provide for an alternative form of standard compilation report when the prescribed form or related instructions call for departure from generally accepted accounting principles by specifying a measurement principle not in conformity with generally accepted accounting principles or by failing to request the disclosures required by generally accepted accounting principles.[1] This statement also provides additional guidance applicable to reports on financial statements included in a prescribed form.[2]

.02 For purposes of this statement, a *prescribed form* is any standard preprinted form designed or adopted by the body to which it is to be submitted, for example, forms used by industry trade associations, credit agencies, banks,

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[1] For purposes of this statement, reference to generally accepted accounting principles includes, where applicable, a comprehensive basis of accounting other than generally accepted accounting principles as defined in SAS No. 62, paragraph 4 [AU section 623.04]. Disclosure of the basis of accounting should be made when a comprehensive basis of accounting other than generally accepted accounting principles is used.

[2] This statement amends SSARS No. 1 [section 100] in four places. The following sentences are added to the end of paragraph 15 of SSARS No. 1 [section 100.15]:

> Also, an accountant may be asked to compile financial statements included in a prescribed form that calls for departure from generally accepted accounting principles. SSARS No. 3 [section 300] provides additional guidance, including an alternative form of standard report, applicable to such compilation engagements.

The following sentence is added to the end of footnote 12, paragraph 16 of SSARS No. 1 [section 100.16, footnote 12]:

> However, see SSARS No. 3 [section 300] for guidance when such financial statements are included in a prescribed form and the prescribed form or related instructions do not request the disclosures required by generally accepted accounting principles.

The following is added as the penultimate sentence of paragraph 45 of SSARS No. 1, as amended [section 100.45]:

> SSARS No. 3 [section 300] provides guidance when the departure is called for by a prescribed form or related instructions.

The following is added as a footnote to the last sentence of paragraph 2 of SSARS No. 1 [section 100.02]:

> SSARS No. 3 [section 300] permits an accountant who has reviewed the financial statements of a nonpublic entity to issue a compilation report on financial statements for the same period that are included in a prescribed form that calls for departure from generally accepted accounting principles.

This statement also amends SSARS No. 2 by adding the following sentence to footnote 3, paragraph 2 [section 200.02, footnote 3]:

> See SSARS No. 3 [section 300] for additional guidance when the accountant compiles comparative financial statements included in a prescribed form that calls for departure from generally accepted accounting principles or, where applicable, from a comprehensive basis of accounting other than generally accepted accounting principles.

[Footnote revised, May 2004, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 10.]

and governmental and regulatory bodies other than those concerned with the sale or trading of securities. A form designed or adopted by the entity whose financial statements are to be compiled is not considered to be a prescribed form. The terms *financial statement* and *nonpublic entity* are defined in paragraph 4 of SSARS No. 1 [section 100.04], as amended.

.03 There is a presumption that the information required by a prescribed form is sufficient to meet the needs of the body that designed or adopted the form and that there is no need for that body to be advised of departures from generally accepted accounting principles required by the prescribed form or related instructions. Therefore, in the absence of a requirement or a request for a review report on the financial statements included in a prescribed form, the following form of standard compilation report may be used when the unaudited financial statements of a nonpublic entity are included in a prescribed form that calls for departure from generally accepted accounting principles:

> I (we) have compiled the (identification of financial statements, including period covered and name of entity) included in the accompanying prescribed form in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants.
>
> My (our) compilation was limited to presenting in the form prescribed by (name of body) information that is the representation of management (owners). I (we) have not audited or reviewed the financial statements referred to above and, accordingly, do not express an opinion or any other form of assurance on them.
>
> These financial statements (including related disclosures) are presented in accordance with the requirements of (name of body), which differ from generally accepted accounting principles. Accordingly, these financial statements are not designed for those who are not informed about such differences.

[As amended, effective for periods ending after December 15, 1993, by Statement on Standards for Accounting and Review Services No. 7.]

.04 If the accountant becomes aware of a departure from generally accepted accounting principles other than departures that may be called for by the prescribed form or related instructions (see paragraph .01), he should follow the guidance in paragraphs 45 through 47 of SSARS No. 1 [section 100.45–.47] regarding such departures. (The sentence introducing the separate paragraph of his report disclosing the departure might read as follows: "However, I did become aware of a departure from generally accepted accounting principles that is not called for by the prescribed form or related instructions, as described in the following paragraph.") If the accountant becomes aware of a departure from the requirements of the prescribed form or related instructions, he should consider that departure as the equivalent of a departure from generally accepted accounting principles in determining its effect on his report. [Revised, November 2002, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 9. Revised, May 2004, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 10.]

.05 The accountant should not sign a preprinted report form that does not conform with the guidance in this statement or SSARS No. 1 [section 100], as amended, whichever is applicable. In such circumstances, the accountant should append an appropriate report to the prescribed form.

[The next page is 3451.]

AR Section 9300

Compilation Reports on Financial Statements Included in Certain Prescribed Forms: Accounting and Review Services Interpretations of Section 300

1. Omission of Disclosures in Financial Statements Included in Certain Prescribed Forms

.01 *Question*—The accountant may have reviewed financial statements including disclosures required by generally accepted accounting principles and be asked to compile financial statements included in a prescribed form which does not request such disclosures. If the measurement principles to be used do not cause the compiled financial statements in the prescribed form to be materially different from the reviewed statements, can the accountant's compilation report on the prescribed form refer to the accountant's report on the reviewed financial statements?

.02 *Interpretation*—Yes. The footnote to paragraph 2 of SSARS No. 1 [section 100.02] (as amended) permits an accountant who has reviewed the financial statements of a nonpublic entity to issue a compilation report on financial statements for the same period that are included in a prescribed form that calls for a departure from generally accepted accounting principles. When the difference between the previously reviewed financial statements and the financial statements included in the prescribed form is limited to the omission of disclosures not requested by the form, the accountant may wish to refer to his review report in his report on the compiled financial statements included in the prescribed form. This might be accomplished by adding a sentence such as the following to the second paragraph of the report illustrated in paragraph 3 of SSARS No. 3 [section 300.03] or as a separate paragraph: "These financial statements were compiled by me (us) from financial statements for the same period which I (we) previously reviewed, as indicated in my (our) report dated _______."* The reference to a previous review report should include a description or a quotation of any modifications of the standard review report previously issued and of any paragraphs emphasizing a matter regarding the financial statements.

.03 If the measurement principles used in the compiled financial statements in the prescribed form cause such financial statements to be materially different from the previously reviewed financial statements, no reference should be made to the review engagement.

[Issue Date: May, 1982.]

[The next page is 3471.]

* The report included in paragraph 3 of SSARS No. 3 [section 300.03] is an alternate form of report. If the accountant elects to use the standard compilation report included in SSARS No. 1, paragraph 17 [section 100.17] this sentence may be added to that report.

AR Section 400

Communications Between Predecessor and Successor Accountants

Issue date, unless otherwise indicated: December, 1981

.01 This statement provides guidance on communications between a predecessor and successor accountant when the successor accountant decides to communicate with the predecessor accountant regarding acceptance of an engagement to compile or review the financial statements of a nonpublic entity.[1] This statement also provides guidance on inquiries a successor accountant may wish to make of a predecessor, and the predecessor's responses, to facilitate the conduct of the successor's compilation or review engagement. It also requires a successor accountant who becomes aware of information that leads him or her to believe the financial statements reported on by the predecessor accountant may require revision to request that the client communicate this information to the predecessor accountant. [As amended, effective for periods ending after December 15, 1993, by Statement on Standards for Accounting and Review Services No. 7. As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.02 The following definitions apply for purposes of this Statement:

> *Successor accountant*. An accountant who has been invited to make a proposal for an engagement to compile or review financial statements and is considering accepting the engagement or an accountant who has accepted such an engagement.
>
> *Predecessor accountant*. An accountant who (*a*) has reported on the most recent compiled or reviewed financial statements or was engaged to perform but did not complete a compilation or review of the financial statements, and (*b*) has resigned, declined to stand for reappointment, or been notified that his or her services have been or may be terminated.

[As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Inquiries Regarding Acceptance of an Engagement

.03 A successor accountant is not required to communicate with a predecessor accountant in connection with acceptance of a compilation or review engagement, but he or she may believe it is beneficial to obtain information that will assist in determining whether to accept the engagement. The successor accountant may consider making inquiries of the predecessor accountant when circumstances such as the following exist:[2]

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[1] [Footnote deleted by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

[2] [Footnote deleted by the issuance of Statement on Standards for Accounting and Review Services No. 7, November 1992.]

a. The information obtained about the prospective client and its management and principals is limited or appears to require special attention.

b. The change in accountants takes place substantially after the end of the accounting period for which statements are to be compiled or reviewed.

c. There have been frequent changes in accountants.

The successor accountant should bear in mind that the predecessor accountant and the client may have disagreed about accounting principles, procedures applied by the predecessor accountant, or similarly significant matters. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.04 The successor accountant should request permission from the prospective client to make any inquiries of the predecessor accountant. Except as permitted by the AICPA Code of Professional Conduct, an accountant is precluded from disclosing any confidential information obtained in the course of an engagement unless the client specifically consents. Accordingly, if the successor accountant decides to communicate with the predecessor, the successor accountant should request the client to (*a*) permit the successor accountant to make inquiries of the predecessor accountant and (*b*) authorize the predecessor accountant to respond fully to those inquiries.[3] If the prospective client refuses to permit the predecessor accountant to respond or limits the response, the successor accountant should inquire about the reasons and consider the implications of that refusal in connection with acceptance of the engagement. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.05 When the successor accountant decides to communicate with the predecessor accountant, the inquiries may be oral or written. The inquiries should be specific and reasonable regarding matters that will assist the successor accountant in determining whether to accept the engagement. Matters subject to inquiry would include (*a*) information that might bear on the integrity of management (owners), (*b*) disagreements with management (owners) about accounting principles or the necessity for the performance of certain procedures or similarly significant matters, (*c*) the cooperation of management (owners) in providing additional or revised information, if necessary, (*d*) the predecessor's knowledge of any fraud or illegal acts perpetrated within the client, and (*e*) the predecessor's understanding of the reason for the change of accountants. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.06 The predecessor accountant should respond promptly and fully to the inquiries, on the basis of known facts. However, if the predecessor accountant decides, due to unusual circumstances[4] such as impending, threatened, or potential litigation; disciplinary proceedings; or other unusual circumstances, not to respond fully to the inquiries, the predecessor accountant should indicate that the response is limited. The successor accountant should consider the reasons and consider the implications of such a response in connection with acceptance of the engagement. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

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[3] The successor accountant is not precluded from making these inquiries before making a proposal for the engagement.

[4] Unpaid fees, as discussed in paragraph .08, are not considered to be an unusual circumstance for purposes of this paragraph; however, see paragraph .08.

Other Inquiries

[.07] [Paragraph deleted by the issuance of Statement on Standards for Accounting and Review Services No. 9, November 2002.]

.08 The successor accountant also may wish to review the predecessor's working papers.[5] In these circumstances, the successor accountant should request the client to authorize the predecessor accountant to allow access. It is customary in such circumstances for the predecessor accountant to make himself or herself available to the successor accountant for consultation and to make available for review certain working papers. The predecessor accountant should determine which working papers are to be made available for review and which may be copied. Ordinarily, the predecessor accountant should provide the successor accountant access to working papers relating to matters of continuing accounting significance and those relating to contingencies. Valid business reasons (including but not limited to unpaid fees), however, may lead the predecessor to decide not to allow access to the working papers.[6] The predecessor accountant may decide to reach an understanding with the successor accountant about the use of the working papers.[7] Further, when more than one accountant is considering acceptance of an engagement, the predecessor accountant should not be expected to make himself or herself or his or her working papers available until the client has designated one of those accountants as the successor accountant. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Successor Accountant's Use of Communications

.09 The successor accountant should not make reference to the report or work of a predecessor accountant in his or her own report, except as specifically permitted by SSARS No. 2 [section 200] or SAS No. 26 [AU section 504] with respect to the financial statements of a prior period. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

Financial Statements Reported on by Predecessor Accountant

.10 If, during the engagement, the successor accountant becomes aware of information that leads him or her to believe that financial statements reported on by the predecessor accountant may require revision, the successor accountant should request the client to communicate this information to the predecessor accountant. SSARS No. 1 [section 100.48] provides guidance to the

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[5] Statement on Standards for Accounting and Review Services do not specify the form or content of the working papers that an accountant should prepare in connection with a review engagement and are silent regarding the working papers, if any, that would be prepared in a compilation engagement. Accordingly, a successor accountant ordinarily would inquire about the nature of the working papers prepared by the predecessor before deciding that access would be helpful.

[6] See Ethics Interpretation 501-1 [ET section 501.02] for guidance on what constitutes an accountant's working papers. [Footnote added April 30, 1982, by the Accounting and Review Services Committee.]

[7] Before permitting access to the working papers, the predecessor accountant may wish to obtain a written communication from the successor accountant regarding the use of the working papers. The Appendix [paragraph .12] contains an illustrative successor accountant acknowledgment letter. [Footnote added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

predecessor accountant in determining an appropriate course of action. [As amended, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9. Revised, May 2004, to reflect conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services No. 10.]

.11 If the client refuses to communicate with the predecessor accountant or if the successor accountant is not satisfied with the predecessor accountant's course of action, the successor accountant should evaluate (*a*) possible implications for the current engagement and (*b*) whether to resign from the engagement. Furthermore, the successor accountant may decide to consult with legal counsel in determining an appropriate course of further action. [Paragraph added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

.12

Appendix

Illustrative Successor Accountant Acknowledgment Letter

Paragraph .08, footnote 7, states, "Before permitting access to the working papers, the predecessor accountant may wish to obtain a written communication from the successor accountant regarding the use of the working papers." The following letter is presented for illustrative purposes only and is not required by professional standards.

[*Date*]

[*Successor Accountant*]

[*Address*]

We have previously [*reviewed or compiled*], in accordance with Statements on Standards for Accounting and Review Services the December 31, 20X1, financial statements of ABC Enterprises (ABC). In connection with your [*review or compilation*] of ABC's 20X2 financial statements, you have requested access to our working papers prepared in connection with that engagement. ABC has authorized our firm to allow you to review those working papers.

Our [*review or compilation*], and the working papers prepared in connection therewith, of ABC's financial statements were not planned or conducted in contemplation of your [*review or compilation*]. Therefore, items of possible interest to you may not have been specifically addressed. Our use of professional judgment for the purpose of this engagement means that matters may have existed that would have been assessed differently by you. We make no representation about the sufficiency or appropriateness of the information in our working papers for your purposes.

We understand that the purpose of your review is to obtain information about ABC and our 20X1 results to assist you in your 20X2 engagement of ABC. For that purpose only, we will provide you access to our working papers that relate to that objective.

Upon request, we will provide copies of those working papers that provide factual information about ABC. You agree to subject any such copies or information otherwise derived from our working papers to your normal policy for retention of working papers and protection of confidential client information. Furthermore, in the event of a third-party request for access to your working papers prepared in connection with your (reviews or compilations) of ABC, you agree to obtain our permission before voluntarily allowing any such access to our working papers or information otherwise derived from our working papers, and to obtain on our behalf any releases that you obtain from such third party. You agree to advise us promptly and provide us a copy of any subpoena, summons, or other court order for access to your working papers that include copies of our working papers or information otherwise derived therefrom.

Please confirm your agreement with the foregoing by signing and dating a copy of this letter and returning it to us.

Very truly yours,

[*Predecessor Accountant*]

By: ___________________________

Accepted:

[*Successor Accountant*]

By: ___________________________ Date: __________________

Even with the client's consent, access to the predecessor accountant's working papers may still be limited. Experience has shown that the predecessor accountant may be willing to grant broader access if given additional assurance concerning the use of the working papers. Accordingly, the successor accountant might consider agreeing to the following limitations on the review of the predecessor accountant's working papers in order to obtain broader access:

- The successor accountant will not comment, orally or in writing, to anyone as a result of the review about whether the predecessor accountant's engagement was performed in accordance with Statements on Standards for Accounting and Review Services.
- The successor accountant will not provide expert testimony or litigation services or otherwise accept an engagement to comment on issues relating to the quality of the predecessor accountant's engagement.

The following paragraph illustrates the above:

> Because your review of our working papers is undertaken solely for the purpose described above and may not entail a review of all our working papers, you agree that (1) the information obtained from the review will not be used by you for any other purpose, (2) you will not comment, orally or in writing, to anyone as a result of that review about whether our engagement was performed in accordance with Statements on Standards for Accounting and Review Services, (3) you will not provide expert testimony or litigation services or otherwise accept an engagement to comment on issues relating to the quality of our engagement.

[Paragraph added, effective November 2002, by Statement on Standards for Accounting and Review Services No. 9.]

[The next page is 3481.]

AR Section 9400

Communications Between Predecessor and Successor Accountants: Accounting and Review Services Interpretations of Section 400

1. Reports on the Application of Accounting Principles

.01 *Question*—SSARS No. 4, *Communications Between Predecessor and Successor Accountants* [section 400], provides guidance on communication between a successor accountant and a predecessor accountant. The guidance provided concerns only the situation in which one accountant succeeds another in a compilation or review engagement.

.02 In other situations, an accountant in public practice may be requested by an entity that has not engaged that accountant to report on its financial statements to provide advice about the application of accounting principles or about the type of report to be issued on its financial statements (compilation, review, or audit report). Such requests are often made to obtain a second opinion about these matters from another accountant. What guidance should be followed by the accountant who is requested to provide advice on these matters?

.03 *Interpretation*—SAS No. 50, *Reports on the Application of Accounting Principles* [AU section 625], as amended, applies to any accountant in public practice asked to provide written advice on the application of accounting principles to specified transactions involving facts and circumstances of a specific entity, or the type of opinion that may be rendered on a specific entity's financial statements.

.04 SAS No. 50 [AU section 625] also applies to oral advice that the reporting accountant concludes is intended to be used by a principal to the transaction as an important factor considered in reaching a decision on the application of accounting principles to a specific transaction, or the type of opinion that may be rendered on a specific entity's financial statements.

.05 Paragraph 9 of SAS No. 50 [AU section 625.09] states that the reporting accountant who is requested to provide such written or oral advice by an entity should consult with that entity's accountant, if any, to ascertain all the available facts relevant to forming a professional judgment. The reporting accountant should follow the performance and reporting guidance in SAS No. 50 [AU section 625] for such engagements.

[Issue Date: August, 1987; Revised: November, 2002.]

[The next page is 3521.]

AR Section 600

Reporting on Personal Financial Statements Included in Written Personal Financial Plans

Issue date, unless otherwise indicated: September, 1986

.01 This statement provides an exemption from Statement on Standards for Accounting and Review Services (SSARS) No. 1 [section 100], as amended, for personal financial statements that are included in written personal financial plans prepared by an accountant, and specifies the form of written report required under the exemption.[1] However, this statement does not preclude an accountant from complying with SSARS No. 1 [section 100] in such engagements.

.02 Because the purpose of such financial statements is solely to assist in developing the client's personal financial plan, they frequently omit disclosures required by generally accepted accounting principles (GAAP) and contain departures from GAAP or from an established comprehensive basis of accounting other than GAAP.

.03 An accountant may submit a written personal financial plan containing unaudited personal financial statements to a client without complying with the requirements of SSARS No. 1 [section 100], as amended, when all of the following conditions exist:

a. The accountant establishes an understanding with the client, preferably in writing, that the financial statements—

(i) Will be used solely to assist the client and the client's advisers to develop the client's personal financial goals and objectives.

(ii) Will not be used to obtain credit or for any purposes other than developing these goals and objectives.

b. Nothing comes to the accountant's attention during the engagement that would cause the accountant to believe that the financial statements will be used to obtain credit or for any purposes other than developing the client's financial goals and objectives.

.04 An accountant using the exemption provided by this statement should issue a written report stating that the unaudited financial statements—

a. Are designed solely to help develop the financial plan.

b. May be incomplete or contain other departures from GAAP and should not be used to obtain credit or for any purposes other than developing the personal financial plan.

c. Have not been audited, reviewed, or compiled.

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[1] For purposes of this statement, personal financial statements are those financial statements of an individual that meet the definition of financial statements in paragraph 4 of SSARS No. 1 [section 100.04], *Compilation and Review of Financial Statements*.

.05 The following is an illustration of an appropriate report when an accountant uses the exemption provided by this statement.

> The accompanying Statement of Financial Condition of X, as of December 31, 19XX, was prepared solely to help you develop your personal financial plan. Accordingly, it may be incomplete or contain other departures from generally accepted accounting principles and should not be used to obtain credit or for any purposes other than developing your financial plan. We have not audited, reviewed, or compiled the statement.

.06 Each of the personal financial statements should include a reference to the accountant's report.

Effective Date

.07 This statement is effective on September 30, 1986.

[The next page is 3531.]

AR Section 9600

Reporting on Personal Financial Statements Included in Written Personal Financial Plans: Accounting and Review Services Interpretation of Section 600

1. Submitting a Personal Financial Plan to a Client's Advisers

.01 *Question*—Paragraph 3 of Statements on Standards for Accounting and Review Services (SSARS) No. 6, *Reporting on Personal Financial Statements Included in Written Personal Financial Plans* [section 600.03], states that an accountant may submit a written personal financial plan containing unaudited personal financial statements to a client without complying with the requirements of SSARS No. 1, *Compilation and Review of Financial Statements* [section 100] when, among other conditions, the accountant establishes an understanding with the client that the financial statements will be used solely to assist the client and the client's advisers to develop the client's personal financial goals and objectives. Does developing the client's personal financial goals and objectives encompass implementing the personal financial plan by the client or the client's advisers?

.02 *Interpretation*—Yes. Developing a client's personal financial goals and objectives includes implementing the personal financial plan by the client or the client's advisers because implementing the plan may be considered the culmination of the process of developing personal financial goals and objectives. Therefore, an accountant may submit a written personal financial plan containing unaudited personal financial statements to a client, to be used by the client or the client's advisers to implement the personal financial plan, without complying with the requirements of SSARS No. 1 [section 100], provided the conditions in paragraph 3 of SSARS No. 6 [section 600.03] exist.

.03 Examples of implementation of a personal financial plan by the client's advisers include use of the plan by:

- an insurance broker who will identify specific insurance products.
- an investment adviser who will provide specific recommendations about the investment portfolio.
- an attorney who will draft a will or trust documents.

[Issue Date: May, 1991.]

[The next page is 4001.]

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APPENDIXES

TABLE OF CONTENTS

[The next page is 4011.]

AR Appendix A

Cross-References to Statements on Standards for Accounting and Review Services

No.	*Date Issued*	*Title*	*Section*
1	Dec. 1978	**Compilation and Review of Financial Statements**	100
2	Oct. 1979	**Reporting on Comparative Financial Statements** Amends section 100.04; Supersedes section 100[.52].	200
3	Dec. 1981	**Compilation Reports on Financial Statements Included in Certain Prescribed Forms** Amends sections 100.02, .15, .16, .41, and 200.02.	300
4	Dec. 1981	**Communications Between Predecessor and Successor Accountants** Amends section 200.16.	400
5	July 1982	**Reporting on Compiled Financial Statements** Deleted by SSARS No. 7, November 1992, because the provisions of SSARS No. 5 have been incorporated into sections 100, 200, and 300.	500
6	Sept. 1986	**Reporting on Personal Financial Statements Included in Written Personal Financial Plans**	600
7	Nov. 1992	**Omnibus Statement on Standards for Accounting and Review Services—1992** Not published as a stand-alone section; Integrated to amend sections 100, 200, 300, and 400; Deletes SSARS No. 5.	
8	Oct. 2000	**Amendment to Statement on Standards for Accounting and Review Services No. 1, *Compilation and Review of Financial Statements*** Not published as a stand-alone section; Amends former section 100.01–.23 (subsequent paragraphs and footnotes have been renumbered accordingly); adds a new Appendix A [paragraph .57] and D [paragraph .60]; deletes former Appendix E [paragraph [.63]].	

No.	*Date Issued*	*Title*	*Section*
9	Nov. 2002	**Omnibus Statement on Standards for Accounting and Review Services—2002** Not published as a stand-alone section; Amends section 100.03, .04, .09, and .11; deletes section 100.12; amends section 100.24; adds section 100.29; amends section 100.30, .32, and .34; deletes section 100.35; amends section 100.38 and .45, adds section 100.53–.55 (subsequent paragraphs and footnotes have been renumbered accordingly); amends section 400.01–.06; deletes section 400.07; amends section 400.08–.10; and adds section 400.11 and .12.	
10	May 2004	**Performance of Review Engagements** Not published as a stand-alone section; Amends section 100.24; amends and transfers section 100.32 to section 100.25; amends section 100.26; adds section 100.29 and .30; amends section 100.31, .32, .34; adds section 100.35; amends section 100.36; adds section 100.37 (subsequent paragraphs have been renumbered accordingly); amends section 100.62; adds a new Appendix H [paragraph .68].	
11	May 2004	**Standards for Accounting and Review Services**. Amends section 200.17.	50

[The next page is 4021.]

AR Appendix B

Cross-Reference Table for Accounting and Review Services Interpretations

(Sections of the text are cross-referenced to Interpretations)

Section	*Interpretation Subject (Interpretation No.)*	*Interpretation Section*
100	Omission of Disclosures in Reviewed Financial Statements (No. 1)	9100.01-.02
100	Financial Statements Included in SEC Filings (No. 2)	9100.03-.05
100	Reporting on the Highest Level of Service (No. 3)	9100.06-.12
100	Planning and Supervision (No. 5)	9100.16-.17
100	Reporting on Tax Returns (No. 10)	9100.31-.32
100	Reporting on a Comprehensive Basis of Accounting Other Than Generally Accepted Accounting Principles (No. 12)	9100.41-.45
100	Differentiating a Financial Statement Presentation From a Trial Balance (No. 15)	9100.54-.57
100	Submitting Draft Financial Statements (No. 17)	9100.61-.62
100	Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions (No. 18)	9100.63-.72
100	Applicability of SSARS No. 1 When Performing Controllership or Other Management Services (No. 21)	9100.80-.84
100	Applicability of Statements on Standards for Accounting and Review Services When an Accountant Engaged to Perform a Business Valuation Derives Information From an Entity's Tax Return (No. 23)	9100.89-.92
100	Omission of the Display of Comprehensive Income in a Compilation (No. 25)	9100.95-.99
100	Submitting a Personal Financial Plan to a Client's Advisers (No. 1)	9600.01-.03
100.01	Differentiating a Financial Statement Presentation From a Trial Balance (No. 15)	9100.54-.57
100.02	Report on the Highest Level of Service (No. 3)	9100.06-.12
100.02	Omission of Disclosures in Financial Statements Included in Certain Prescribed Forms (No. 1)	9300.01-.03

Section	Interpretation Subject (Interpretation No.)	Interpretation Section
100.03	Reports on Specified Elements, Accounts or Items of a Financial Statement (No. 8)	9100.27-.28
100.03	Applicability of Statements on Standards for Accounting and Review Services When an Accountant Engaged to Perform a Business Valuation Derives Information From an Entity's Tax Return (No. 23)	9100.89-.92
100.04	Financial Statements Included in SEC Filings (No. 2)	9100.03-.05
100.04	Reporting on the Highest Level of Service (No. 3)	9100.06-.12
100.04	Reporting on a Comprehensive Basis of Accounting Other Than Generally Accepted Accounting Principles (No. 12)	9100.41-.45
100.04	Applicability of Statements on Standards for Accounting and Review Services When an Accountant Engaged to Perform a Business Valuation Derives Information From an Entity's Tax Return (No. 23)	9100.89-.92
100.05	Additional Procedures (No. 13)	9100.46-.49
100.05	Communicating Possible Fraud and Illegal Acts to Management and Others (No. 26)	9100.100-.103
100.08	Reporting on the Highest Level of Service (No. 3)	9100.06-.12
100.09	Additional Procedures (No. 13)	9100.46-.49
100.14	Omission of Disclosures in Financial Statements Included in Certain Prescribed Forms (No. 1)	9300.01-.03
100.16	Omission of Disclosures in Reviewed Financial Statements (No. 1)	9100.01-.02
100.16	Reporting When Management Has Elected to Omit Substantially All Disclosures (No. 9)	9100.29-.30
100.16	Reporting on Uncertainties (No. 11)	9100.33-.40
100.16	Use of "Selected Information—Substantially All Disclosures Required by Generally Accepted Accounting Principles Are Not Included" (No. 22)	9100.85-.88
100.17	Omission of Disclosures in Reviewed Financial Statements (No. 1)	9100.01-.02
100.17	Reporting on Uncertainties (No. 11)	9100.33-.40
100.17	Reporting on a Comprehensive Basis of Accounting Other than Generally Accepted Accounting Principles (No. 12)	9100.41-.45
100.18	Omission of Disclosures in Reviewed Financial Statements (No. 1)	9100.01-.02
100.18	Reporting When Management Has Elected to Omit Substantially All Disclosures (No. 9)	9100.29-.30

Section	Interpretation Subject (Interpretation No.)	Interpretation Section
100.18	Reporting on Uncertainties (No. 11)	9100.33-.40
100.18	Omission of the Display of Comprehensive Income in a Compilation (No. 25)	9100.95-.99
100.20	Submitting Draft Financial Statements (No. 17)	9100.61-.62
100.21	Submitting Draft Financial Statements (No. 17)	9100.61-.62
100.22	Submitting Draft Financial Statements (No. 17)	9100.61-.62
100.23	Submitting Draft Financial Statements (No. 17)	9100.61-.62
100.32	Additional Procedures (No. 13)	9100.46-.49
100.34	Reporting When There are Significant Departures from Generally Accepted Accounting Principles (No. 7)	9100.23-.26
100.41	Omission of Disclosures in Reviewed Financial Statements (No. 1)	9100.01-.02
100.41	Reporting on Uncertainties (No. 11)	9100.33-.40
100.41	Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions (No. 18)	9100.63-.72
100.41	Reporting When Financial Statements Contain a Departure From Promulgated Accounting Principles That Prevents the Financial Statements From Being Misleading (No. 19)	9100.73-.75
100.41	Omission of the Display of Comprehensive Income in a Compilation (No. 25)	9100.95-.99
100.41	Reporting on Financial Statements that Previously Did Not Omit Substantially All Disclosures (No. 1)	9200.01-.04
100.42	Withdrawal From Compilation or Review Engagements (No. 6)	9100.18-.22
100.42	Reporting When There Are Significant Departures from Generally Accepted Accounting Principles (No. 7)	9100.23-.26
100.42	Reporting on Uncertainties (No. 11)	9100.33-.40
100.42	Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions (No. 18)	9100.63-.72
100.42	Reporting When Financial Statements Contain a Departure From Promulgated Accounting Principles That Prevents the Financial Statements From Being Misleading (No. 19)	9100.73-.75

Section	*Interpretation Subject (Interpretation No.)*	*Interpretation Section*
100.42	Omission of the Display of Comprehensive Income in a Compilation (No. 25)	9100.95-.99
100.42	Reporting on Financial Statements that Previously Did Not Omit Substantially All Disclosures (No. 1)	9200.01-.04
100.43	Withdrawal From Compilation or Review Engagements (No. 6)	9100.18-.22
100.43	Reporting on Uncertainties (No. 11)	9100.33-.40
100.43	Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions (No. 18)	9100.63-.72
100.43	Reporting When Financial Statements Contain a Departure From Promulgated Accounting Principles That Prevents the Financial Statements From Being Misleading (No. 19)	9100.73-.75
100.43	Omission of the Display of Comprehensive Income in a Compilation (No. 25)	9100.95-.99
100.43	Reporting on Financial Statements that Previously Did Not Omit Substantially All Disclosures (No. 1)	9200.01-.04
100.44	Discovery of Information After the Date of the Accountant's Report (No. 4)	9100.13-.15
100.45	Reports on Specified Elements, Accounts, or Items of a Financial Statement (No. 8)	9100.27-.28
200	Reporting on Financial Statements that Previously Did Not Omit Substantially All Disclosures (No. 1)	9200.01-.04
200.01	Financial Statements Included in SEC Filings (No. 2)	9100.03-.05
200.29	Reporting on Financial Statements that Previously Did Not Omit Substantially All Disclosures (No. 1)	9200.01-.04
300	Special-Purpose Financial Presentations to Comply With Contractual Agreements or Regulatory Provisions (No. 18)	9100.63-.72
300.03	Omission of Disclosures in Financial Statements Included in Certain Prescribed Forms (No. 1)	9300.01-.03
400	Communicating Possible Fraud and Illegal Acts to Management and Others (No. 26)	9100.100-.103
400	Reports on the Application of Accounting Principles (No. 1)	9400.01-.05
600.03	Submitting a Personal Financial Plan to a Client's Advisers (No. 1)	9600.01-.03

[The next page is 4031.]

AR Appendix C

Schedule of Changes in Statements on Standards for Accounting and Review Services

Section	Par.	Changes	Date of Change
50		SSARS 11 added	May, 2004
100[1, 2]	.01	Amended by SSARS 8	October, 2000
100[2]	.02	Amended by SSARS 3	December, 1981
100[2]	.02	Amended by SSARS 8	October, 2000
100[2]	.03	Amended by SSARS 8	October, 2000
100[2]	.03	Amended by SSARS 9	November, 2002
100[2]	.04	Amended by SSARS 2	October, 1979
100[2]	.04	Amended by SSARS 8	October, 2000
100[2]	.04	Amended by SSARS 9	November, 2002
100[2]	.05–.09	Amended by SSARS 8	October, 2000
100[2]	.09	Amended by SSARS 9	November, 2002
100[2]	.10	Amended by SSARS 8	October, 2000
100[2]	.11	Amended by SSARS 8	October, 2000
100[2]	.11	Amended by SSARS 9	November, 2002
100[2]	.12	Amended by SSARS 8	October, 2000
100[2]	.12	Deleted by SSARS 9	November, 2002
100[2]	.13–.14	Amended by SSARS 8	October, 2000
100[2]	.15–.16	Amended by SSARS 3	December, 1981
100[2]	.17–.23	Amended by SSARS 8	October, 2000
100[2]	.24	Amended by SSARS 9	November, 2002
100[2]	.24	Amended by SSARS 10	May, 2004
100[2, 3]	.25	Amended by SSARS 9	November, 2002
100[2, 4]	.25	Amended and transferred, from former 100.32, by SSARS 10	May, 2004
100[2, 4]	.26	Amended by SSARS 10	May, 2004
100[2, 5]	.29–.30	New paragraphs added by issuance of SSARS 10	May, 2004
100[2, 5]	.31	Amended by SSARS 10	May, 2004
100[2, 5]	.32	New paragraph added by issuance of SSARS 9	November, 2002
100[2, 5]	.32	Amended by SSARS 10	May, 2004

Section	*Par.*	*Changes*	*Date of Change*
100[2, 5]	.33	Amended by SSARS 9	November, 2002
100[2, 5]	.34	Amended by SSARS 10	May, 2004
100[2, 6]	.35	New paragraph added by issuance of SSARS 10	May, 2004
100[2, 6]	.36	Amended by SSARS 10	May, 2004
100[2, 7]	.37	New paragraph added by issuance of SSARS 10	May, 2004
100[2, 7]	.38	Amended by SSARS 9	November, 2002
100[2, 7]	.39	Deleted by SSARS 9	November, 2002
100[2, 7]	.42	Amended by SSARS 9	November, 2002
100[2, 7]	.44	Amended by SSARS 3	December, 1981
100[2, 7]	.45	Amended by SSARS 5	July, 1982
100[2, 7]	.45	Amended by SSARS 3	December, 1981
100[2, 7]	.49	Amended by SSARS 9	November, 2002
100[2, 7]	.56	Superseded by SSARS 2	October, 1979
100[2, 7]	.57–.59	New paragraphs added by issuance of SSARS 9	November, 2002
100[2, 7]	.61	New paragraph added by issuance of SSARS 8	October, 2000
100[2, 7]	.62	Amended by SSARS 10	May, 2004
100[2, 7]	.63	Amended by SSARS 5	July, 1982
100[2, 7]	.64	New paragraph added by issuance of SSARS 8	October, 2000
100[2]	.67	Deleted by SSARS 8	October, 2000
100[2]	.68	New paragraph added by issuance of SSARS 10	May, 2004
200[1]	.01	Revised by SSARS 8	October, 2000
200	.02	Amended by SSARS 3	December, 1981
200	.02	Revised by SSARS 8	October, 2000
200	.09	Amended by SSARS 5	July, 1982
200	.09	Amended by SSARS 7	November, 1992
200	.10	Amended by SSARS 7	November, 1992
200	.16	Amended by SSARS 4	December, 1981
200	.30	Amended by SSARS 5	July, 1982
200	.30	Amended by SSARS 7	November, 1992
200	.33–.35	Deleted by SSARS 8	October, 2000
300[1]	.03	Amended by SSARS 5	July, 1982
300	.03	Amended by SSARS 7	November, 1992
400	.01	Amended by SSARS 7	November, 1992
400	.01	Amended by SSARS 9	November, 2002

Section	*Par.*	*Changes*	*Date of Change*
400	.02	Amended by SSARS 9	November, 2002
400	.03	Amended by SSARS 7	November, 1992
400	.03–.06	Amended by SSARS 9	November, 2002
400	.07	Deleted by SSARS 9	November, 2002
400	.08–.10	Amended by SSARS 9	November, 2002
400	.11–.12	New paragraphs added by issuance of SSARS 9	November, 2002
500[1]	. . .	Deleted by SSARS 7	November, 1992

[1] Statement on Standards for Accounting and Review Services No. 5, which was deleted by Statement on Standards for Accounting and Review Services No. 7, has been incorporated into sections 100, 200, and 300.

[2] This section has been revised to reflect the amendments and conforming changes necessary due to the issuance of Statement on Standards for Accounting and Review Services Nos. 7 and 8, effective for periods ending after December 15, 1993, and for financial statements submitted after December 31, 2000, respectively. In addition, conforming changes to terminology and cross references have been made throughout this section.

[3] Section 100 paragraph .32 renumbered section 100 paragraph .25 by issuance of Statement on Standards for Accounting and Review Services No. 10.

[4] Section 100 paragraphs .25 through [.63] renumbered .26 through [.63] by issuance of Statement on Standards for Accounting and Review Services No. 10.

[5] Section 100 paragraphs .29 through [.63] renumbered .31 through [.65] by issuance of Statement on Standards for Accounting and Review Services No. 10.

[6] Section 100 paragraphs .35 through [.65] renumbered .36 through [.66] by issuance of Statement on Standards for Accounting and Review Services No. 10.

[7] Section 100 paragraphs .37 through [.66] renumbered .38 through [.67] by issuance of Statement on Standards for Accounting and Review Services No. 10.

[The next page is 4101.]

AR TOPICAL INDEX

References are to AR section and paragraph numbers.

A

B

C

[The next page is 4269.]