

October 26, 2022

By email: comments@pcaobus.org

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006-2803

Re: Request for Information and Comment on the Application and Use of the PCAOB's Interim Attestation Standards

Dear Office of the Secretary:

The Center for Audit Quality (CAQ) is a nonpartisan public policy organization serving as the voice of U.S. public company auditors and matters related to the audits of public companies. The CAQ promotes high-quality performance by U.S. public company auditors; convenes capital market stakeholders to advance the discussion of critical issues affecting audit quality, U.S. public company reporting, and investor trust in the capital markets; and using independent research and analyses, champions policies and standards that bolster and support the effectiveness and responsiveness of U.S. public company auditor firm and audits to dynamic market conditions. This letter represents the observations of the CAQ based upon feedback and discussions with certain of our member firms, but not necessarily the views of any specific firm, individual, or CAQ Governing Board member.

The CAQ commends the Public Company Accounting Oversight Board (Board or PCAOB) for inviting information and public comment on the Application and Use of the PCAOB's Interim Attestation Standards (request for information). We appreciate the opportunity to comment as we have unique insight to the U.S. public company audit profession.

Below we have responded to certain of the individual questions in the request for information. Unlike other standard setting projects where the PCAOB can gather information through its inspection process, it is our understanding that much of the attestation work conducted today is not within the jurisdiction of the PCAOB's inspection program. We have responded to the questions in the request for information with information about the intended users of attestation reports and the attestation standards most commonly used today. We believe that understanding why, how, and which attestation standards are used will help inform the Board as they proceed with their interim attestation standards project.



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We commented to the SEC on their recent climate proposal that international coordination on ESG disclosure standards will be especially important as disclosure regimes develop around the globe.¹ As demand for attest engagements evolves, it is equally important for the PCAOB to monitor developments in attestation (and other assurance) standards (AICPA and IAASB, respectively) and engage in a dialogue to foster convergence.

Use of Attestation Reports

1. Aside from regulatory bodies, who are the users of attestation reports and how do they benefit from these reports? Please provide details.

Use of the PCAOB's interim attestation standards is typically limited to those instances where a regulatory or similar body requires an attest engagement be performed in accordance with the PCAOB's interim attestation standards (See our response to Question 5).

However, attestation reports (issued in accordance with AICPA attestation standards) are used by a broad spectrum of stakeholders, including those that require attest engagements to be performed (e.g., regulatory bodies), as well as entities beyond regulatory bodies who voluntarily obtain attestation reports to assist them in making a wide variety of decisions. Intended users beyond regulatory bodies include:

- Companies (e.g., seeking attestation reports for internal use)
- Financial statement auditors (e.g., SOC 1 reports)²
- Customers (e.g., SOC 1 and SOC 2 reports)³
- Current and potential investors (e.g., ESG reports, KPIs)
- Issuers/underwriters (e.g., asset-backed securities (ABS) agreed-upon procedures)
- Lenders/banks (e.g., contractual terms)

¹ See [CAQ comment letter](#).

² SOC 1 reports are used to determine whether the auditor can place reliance on the controls at a service organization that provide services to their client when those controls are likely to be relevant to their client's internal control over financial reporting.

³ SOC 2 reports are intended to meet the needs of a range of users that need detailed information and assurance about the controls at a service organization relevant to security, availability, and processing integrity of the systems the service organization uses to process users' data and the confidentiality and privacy of the information processed by these systems.



Attest engagements performed by independent practitioners build credibility and trust in financial and non-financial information. CAQ member firms continue to see interest and requests for attestation reports (issued in accordance with AICPA attestation standards) increase as users find value in subject matters beyond historical financial statements and internal control over financial reporting.

- 2. Do users of attestation reports influence the type of attest engagements performed? If so, how? Please provide details.*

If a requirement for a specific attest engagement is not set forth in a contract, law, or regulation, (i.e., is voluntarily procured), the type of attest engagement performed is generally influenced by the engaging party and the information needs of the intended users of the report. Consideration of the intended user needs often include views of the engaging party, the practitioner's experience (e.g., from other engagements), and direct interaction with one or more intended users of the report.

We note that, even where a contract, law, or regulation requires a third-party engagement, the terminology used regarding what type of service the third party should be engaged to perform can be vague or subject to interpretation. For example, a contract may require a party to have an "audit" performed in connection with information it is providing to the other party to the contract (commonly referred to as an "audit provision"). In that circumstance, the engaging party would need to assess which type of attest service (i.e., review, examination, or agreed upon procedures (AUP)) meets the needs of the other party (the intended user), which is often determined in consultation with the other party. Even where the contract uses the term "audit" (implying some level of assurance), the parties to the contract may agree that an AUP meets the intended needs.

- 3. What attestation reports do investors find to be most useful in making investment decisions? Please provide details.*

While the CAQ does not represent investors, we can provide our perspective on practice issues related to various types of attestation reports. The objectives of an examination engagement are to obtain reasonable assurance (a high but not absolute level of assurance) and express an opinion about whether the information is in accordance with the criteria, in all material respects. A practitioner obtains the same level of assurance in an examination engagement as the practitioner does in a financial statement audit; accordingly, there may be less risk of investors and other users of the information misunderstanding the level of assurance, than in a review engagement where the practitioner obtains limited assurance.



The concept of limited assurance (or “moderate” assurance as used in the PCAOB interim attestation standards) obtained in a review engagement is described in the professional standards and understood by practitioners; however, it is frequently misunderstood by the general public and intended users of review engagements. As a result, the users of a review report may inappropriately analogize a review to an examination and incorrectly presume that reasonable assurance was obtained. The objective of a review engagement is to obtain limited assurance and express a conclusion about whether the practitioner is aware of any material modifications that should be made to the information in order for it to be in accordance with the criteria. Review engagements are substantially less in scope than an examination engagement that result in a meaningful but lower level of assurance.

AUP engagements are fundamentally different from a review or examination engagement in that the practitioner is focused on reporting factual findings as a result of procedures performed versus expressing a conclusion or opinion. The general public and intended audience of AUP reports may not always appreciate that no assurance is obtained in an AUP engagement.

4. Could changes to PCAOB attestation standards help to inform or protect investors? Please provide details

Please see response to Question 8.

Current Practice

5. What types of attest engagements are currently performed under PCAOB attestation standards? Please describe the circumstances under which these engagements are performed and the type of attestation provided (e.g., examination, review, or agreed-upon procedures).

To our knowledge, the only engagements that are performed *solely* in accordance with PCAOB attestation standards and subject to the jurisdiction of the PCAOB’s inspection program are attest engagements related to brokers and dealers (i.e., engagements performed under PCAOB AT No. 1 and AT No. 2).

In the financial services industry, there are some instances where a regulator or other body requires an attest engagement be performed in accordance with PCAOB interim attestation standards, as follows:



- Regulation AB examination engagements (PCAOB AT Section 601)
- SIPC agreed-upon procedures engagements (Form SIPC-3 AUP - exemption from SIPC and Form SIPC-7 AUP - general assessment reconciliation) (PCAOB AT Section 201)

However, for these engagements, practitioners are required to perform the engagements in accordance with AICPA attestation standards given that the AICPA Code of Professional Conduct requires practitioners to use AICPA attestation standards with limited exceptions. As a result, these engagements are performed under both PCAOB and AICPA attestation standards.⁴

6. Are attest engagements being performed pursuant to AT 301, AT 401, or AT 701? If so, please describe the circumstances under which these engagements are performed, including the attestation standard used and the type of attestation provided (e.g., examination, review, or agreed-upon procedures). Are attest engagements being performed that apply the interpretations in AT 9101? If so, please describe the circumstances and nature of work performed.

The CAQ is unaware of attest engagements related to financial forecasts and projections, pro forma financial information, or management’s discussion and analysis conducted in accordance with PCAOB interim attestation standards AT Sections 301, 401, or 701, respectively. We are also not aware of any engagements being performed that apply interpretation 1 in AT Section 9101.

7. As described above, some regulators require attestation reports to be issued under PCAOB attestation standards. Do other organizations or entities require attestation reports issued under PCAOB attestation standards? If so, please provide relevant details, including the subject matter and the specific standards applied. Alternatively, are there specific circumstances in which firms have chosen to voluntarily perform attest engagements under PCAOB attestation standards? If so, please provide relevant details.

Outside of the engagements identified in response to Question 5, we are not aware of any other organizations that require attestation reports issued under PCAOB attestation standards. It is our understanding that public accounting firms generally do not voluntarily perform attest engagements under PCAOB interim attestation standards given that they would still be required to perform the

⁴ The “Compliance With Standards Rule” (ET sec. 1.310.001) of the AICPA Code of Professional Conduct requires members who perform professional services to comply with standards promulgated by bodies designated by the Council of the AICPA. The AICPA Accounting and Review Services Committee, Auditing Standards Board, and Management Consulting Services Executive Committee are the bodies that have been authorized under the “General Standards Rule” (ET sec. 1.300.001) and the “Compliance With Standards Rule” of the AICPA Code of Professional Conduct to promulgate attestation standards in their respective areas of responsibility.



engagement under AICPA attestation standards (as explained in response to Question 5). As a result, public accounting firms generally perform the vast majority of attest engagements solely in accordance with AICPA attestation standards (excluding engagements for broker-dealers as noted in Question 5).⁵

Potential Updates to Requirements

8. Are specific improvements needed to PCAOB attestation standards, including as currently used or for anticipated future uses? If so, please describe the needed improvements.

As noted in our response to Question 6, we are not aware of practitioners performing attest engagements pursuant to AT Sections 301, 401, and 701, or interpretation 1 in AT Section 9101. Given this lack of market demand for attestation on these subject matters, we do not believe that any improvements to these standards and interpretations are needed and further believe that these standards and interpretations could be repealed.

Regarding the remaining standards (i.e., AT Sections 101, 201, and 601), given the very limited use of these standards (as noted in response to Question 5) and the fact that any engagements performed using these standards are also required to be performed using current AICPA attestation standards (as explained in response to Question 5) we do not believe the PCAOB needs to prioritize any updates to these standards. However, if the PCAOB were to decide to update these interim attestation standards, we believe that the public interest would be best served by the PCAOB considering many of the significant areas for which the equivalent AICPA attestation standards have been updated over the last 20 years (e.g., the restructuring of the standards, the addition of a requirement to request an assertion for an assertion-based examination and a review engagement, multiple updates for AUPs (which include removing the requirement that the practitioner request an assertion from the responsible party and permitting the practitioner to issue a general-use report)).⁶ The current AICPA attestation standards are

⁵ In an analysis conducted by the CAQ of [S&P 500 companies' ESG reporting](#), we observed 43 companies obtained assurance from public company auditors. Upon further evaluation of the assurance reports, 35 companies obtained assurance in accordance with AICPA attestation standards from US public company audit firms, 4 in accordance with ISAE 3000 from non-US public company audit firms, 1 in accordance with both AICPA attestation standards and ISAE 3000 from a US public company audit firm, and 3 where it was unknown.

⁶ CAQ staff are available to discuss with the PCAOB further detail on the changes to the AICPA attestation standards since 2003.



widely used and accepted today,⁷ have been subject to rigorous due process,⁸ have evolved to respond to the needs of the users of information subject to attest engagements, and are largely converged with international standards, and as such could provide a timely and effective path forward for the PCAOB. We would also recommend that the PCAOB look to the extensive authoritative application guidance (specific to certain subject matters including ESG)⁹ that exists for the current AICPA attestation standards, if the PCAOB were to update certain of its interim attestation standards. Further, we also encourage the PCAOB to monitor and consider the work of international standard setters, e.g., IAASB to help promote alignment.

9. Is the work of others, including that of specialists and internal auditors, commonly used in performing attest engagements? If so, please describe the relevant circumstances, the nature of the work performed, and how it is used.

Using the work of others in attest engagements depends on the subject matter being reported on. For example, in many GHG emissions engagements, the nature of the subject matter and measurement methodologies will need specialized skill or technical knowledge in a field other than assurance and may require utilizing the work of specialists.

10. Are other accountants (e.g., other audit firms) used in performing attest engagements? If so, please describe the relevant circumstances, the nature of the work performed, and how it is used.

Use of other accountants (e.g., component auditors or other auditors) in attest engagements is significantly less common than in historical financial statement audits.

13. Are engagement quality reviewers used in attest engagements performed under PCAOB attestation standards as they are under AT No. 1 and AT No. 2? If so, please describe the circumstances in which they

⁷ The list below shows how many firms enrolled in the AICPA's peer review program, as of June 1, 2022, indicated they performed engagements subject to the attestation standards (based on information provided as part of the peer review process in the last three years):

- 3,331 firms performed agreed-upon procedures engagements using AICPA attestation standards
- 855 firms performed examination engagements using AICPA attestation standards
- 400 firms performed review engagements using AICPA attestation standards.

(Statistics provided by the AICPA peer review team.)

⁸ The AICPA follows a rigorous process in developing and issuing its standards; this includes the discussion of issues related to proposed standards and drafts of standards at public meetings of the Auditing Standards Board (ASB), public exposure of the proposed standards, and consideration of comments received at such public meetings. See [asb-operating-policies.pdf \(aicpa.org\)](https://www.aicpa.org/standards/operating-policies).

⁹ A list of authoritative attestation guidance can be found in Appendix A.



are used. What challenges or unintended consequences might arise if PCAOB attestation standards required an engagement quality review? Please describe specific concerns, if any, with such a requirement.

Engagement quality reviewers (EQRs) are used in the regulation AB examination engagements and the SIPC agreed-upon procedures engagements (referred to in Question 5). While not required, the international assurance standards and the AICPA attestation standards also have the concept of an EQR and EQRs are used in many engagements. Practitioners often use EQRs in higher risk situations. For small engagements that are very straight forward and low risk in nature (e.g., certain AUPs) requiring EQRs could result in unnecessary costs without a corresponding benefit to quality.

Economic Implications

14. *Is data or other information on current practices available that would help to inform the staff's analysis? If so, please provide such data and other relevant information.*

Please see details about current practices regarding attestation standards within our response to Question 8.

15. *What economic implications (including potential benefits and costs) may be associated with updating PCAOB attestation standards, such as unintended consequences from the possible consolidation or elimination of certain standards? Please provide data and other relevant information.*

We encourage the PCAOB to monitor and consider developments in standards in other jurisdictions (e.g., IAASB standards). While there are unique qualities related to the U.S. capital markets and the audits of U.S. public companies, collaboration among standard setters contributes to quality. Commonality among standards allows for more consistent application of standards by practitioners globally, improving quality, and reducing the costs (including opportunity costs) of developing methodology that supports complying with the requirements of different standards (e.g., PCAOB, IAASB, and AICPA). Further, investors and other users of attestation reports would likely benefit from attestation reports that are comparable.

CAQ

The CAQ appreciates the opportunity to provide information and comment on the Application and Use of the PCAOB's Interim Attestation Standards. We would be pleased to discuss our comments or answer any questions regarding the views expressed in this letter. Please address questions to Dennis McGowan (dmcgowan@thecaq.org) or Desiré Carroll (dcarroll@thecaq.org).

Sincerely,



Dennis J. McGowan, CPA
Vice President, Professional Practice
Center for Audit Quality

cc:

PCAOB

Erica Y. Williams, Chair
Duane M. DesParte, Board member
Christina Ho, Board member
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Anthony C. Thompson, Board member
Barbara Vanich, Acting Chief Auditor

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Paul Munter, Acting Chief Accountant
Diana Stoltzfus, Deputy Chief Accountant

IAASB

Tom Seidenstein, Chair

Appendix A

A.1 Current AICPA Attestation Standards

This sheet provides links to the most current version of the AICPA attestation standards used by practitioners today.

[AT-C Section 105 Concepts Common to All Attestation Engagements](#)

[AT-C Section 205 Assertion-Based Examination Engagements](#)

[AT-C Section 206 - Direct Examination Engagements](#)

[AT-C Section 210 Review Engagements](#)

[AT-C Section 215 Agreed-Upon Procedures Engagements](#)

[AT-C Section 305 Prospective Financial Information](#)

[AT-C Section 310 Reporting on Pro Forma Financial Information](#)

[AT-C Section 315 Compliance Attestation](#)

[AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting](#)

[AT-C Section 395 Management's Discussion and Analysis](#)

A.2 Current AICPA Authoritative Guidance (Guides, Interpretations and Statements of Position) for Attestation Engagements

The left hand side of this sheet lists the most current version of AICPA authoritative attestation guidance in use by practitioner's today. Across the top, the columns list the most current version of the AICPA attestation standards. The "X" indicates which attestation standards the guidance/interpretation/SOP relates to or can be used in conjunction with.

		AICPA Attestation Standards									
		AT-C Section 105 Concepts Common to All Attestation Engagements	AT-C Section 205 Assertion-Based Examination Engagements	AT-C Section 206 - Direct Examination Engagements	AT-C Section 210 Review Engagements	AT-C Section 215 Agreed-Upon Procedures Engagements	AT-C Section 305 Prospective Financial Information	AT-C Section 310 Reporting on Pro Forma Financial Information	AT-C Section 315 Compliance Attestation	AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting	AT-C Section 395 Management's Discussion and Analysis
Guide/Interpretation/SOP	Description:										
Attestation Engagements on Sustainability Information (Including Greenhouse Gas Emissions Information) Guide	Provides guidance for examinations and reviews of sustainability information	X	X		X						
Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting (SOC 1®)	Helps practitioners effectively perform SOC 1® engagements under AT-C section 320	X	X							X	
SOC 2® Reporting on an Examination of Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy	Provides "how-to" guidance for service auditors performing examinations, to report on a service organization's controls over its system relevant to security, availability, processing integrity, confidentiality, or privacy	X	X							X	
SOC for Supply Chain: Reporting on an Examination of Controls Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy in a Production, Manufacturing, or Distribution System.	This guide enables practitioners to examine and report on the description of a system for manufacturing, producing and distributing goods as well as on the controls within that system using a dynamic, proactive, and agile approach.	X	X							X	
Cybersecurity Risk Management	The Guide provides guidance to practitioners engaged to examine and report on an entity's cybersecurity risk management program	X	X							X	
Airlines	Airlines Guide provides an illustrative report when a practitioner expresses an opinion on management's assertion about the effectiveness of an entity's internal control.	X	X								

GUIDES

AICPA Attestation Standards

AT-C Section 105 Concepts Common to All Attestation Engagements	AT-C Section 205 Assertion-Based Examination Engagements	AT-C Section 206 - Direct Examination Engagements	AT-C Section 210 Review Engagements	AT-C Section 215 Agreed-Upon Procedures Engagements	AT-C Section 305 Prospective Financial Information	AT-C Section 310 Reporting on Pro Forma Financial Information	AT-C Section 315 Compliance Attestation	AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting	AT-C Section 395 Management's Discussion and Analysis
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INTERPRETATIONS	Broker Dealer	Broker Dealer Guide references AT 1 requirement	X			X					
	Government Auditing Standards and Single Audits	Provides option to examine the schedule of expenditures of federal awards or an assertion related to the schedule of expenditures of federal awards.	X	X							
	Healthcare Entities	Provides guidance regarding attestation engagements related to municipal securities issuance	X	X		X	X				
	Investment Companies	Provides guidance regarding examinations of securities	X	X				X			
	Not-for-Profit Entities	References engagements/reports required by Governmental Auditing Standards	X	X							
	Prospective Financial Information	Provides guidance regarding examinations and AUP on prospective financial information (AT-C section 210 expressly prohibits the performance of a review of PFI)	X	X			X				
	State and Local Governments	Directs that practitioners can perform an examination of census data (includes illustrative report)	X	X							
	Depository Institutions	Practitioners may be engaged to examine management's assertions regarding compliance with certain U.S. Department of Education requirements or compliance with SEC Regulation AB.	X						X		X
	9105.01 Responding to Requests for Reports on Matters Related to Solvency		X								
	9105.02 Applicability of Attestation Standards to Litigation Services		X								
	9105.03 Providing Access to or Copies of Engagement Documentation to a Regulator		X								
9105.04 Performing and Reporting on an Attestation Engagement Under Two Sets of Attestation Standards		X									
9205.01 Reporting on Attestation Engagements Performed in Accordance With <i>Government Auditing Standards</i>		X	X								

AICPA Attestation Standards

AT-C Section 105 Concepts Common to All Attestation Engagements	AT-C Section 205 Assertion-Based Examination Engagements	AT-C Section 206 - Direct Examination Engagements	AT-C Section 210 Review Engagements	AT-C Section 215 Agreed-Upon Procedures Engagements	AT-C Section 305 Prospective Financial Information	AT-C Section 310 Reporting on Pro Forma Financial Information	AT-C Section 315 Compliance Attestation	AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting	AT-C Section 395 Management's Discussion and Analysis
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STATEMENTS OF POSITION (SOPs)	9205.02 Reporting on the Design of Internal Control	X	X						
	SOP 99-1, Guidance to Practitioners in Conducting and Reporting on an Agreed-Upon Procedures Engagement to Assist Management in Evaluating the Effectiveness of Its Corporate Compliance Program	X				X			
	SOP 01-3, Performing Agreed-Upon Procedures Engagements That Address Internal Control Over Derivative Transactions as Required by New York State Insurance Law	X				X			
	SOP 02-1, Performing Agreed-Upon Procedures Engagements That Address Annual Claims Prompt Payment Reports as Required by the New Jersey Administrative Code	X				X			
	SOP 07-2, Attestation Engagements That Address Specified Compliance Control Objectives and Related Controls at Entities That Provide Services to Investment Companies, Investment Advisers, or Other Service Providers	X	X						
	SOP 13-2, Performing Agreed-Upon Procedures Engagements That Address the Completeness, Mapping, Consistency, or Structure of XBRL-Formatted Information	X				X			
	SOP 20-1, Reporting Pursuant to the 2020 Global Investment Performance Standards	X	X						
	SOP 21-1, Performing Agreed-Upon Procedures Related to Rated Exchange Act Asset-Backed Securities Third-Party Due Diligence Services as Defined by SEC Release No. 34-72936	X				X			

A.3 Overview of changes made to the AICPA Attestation Standards (since interim adoption by the PCAOB in 2003)

This sheet provides a high-level list of the changes made to the AICPA attestation standards since they were adopted by the PCAOB. It shows the evolution of those standards over time indicating:

- the PCAOB interim adopted AICPA attestation standards as the starting point
- the subsequent updates made to those standards as well as new standards that were issued by the AICPA,
- the clarification of all of the above-mentioned standards in 2016
- the further updates and revisions made to the clarified AICPA attestation standards by the AICPA
- the current AICPA attestation standards in use by practitioner's today

Pre-Clarity Statements on Standards for Attestation Engagements			Clarified Statements on Standards for Attestation Engagements			Link to Most Current Version
PCAOB Interim Attestation Standards (adopted April 2003) (Shown in the grey shaded box)						
SSAE 10 (as amended by SSAE Nos. 11 and 12)	AT Section 101 Attest Engagements	Updated By SSAE 14	By SSAE 18 in 2016	AT-C Section 105 Concepts Common to All Attestation Engagements	Updated after clarification By SSAE 19 and 21 By SSAE 20 and 21	AT-C Section 105 Concepts Common to All Attestation Engagements
SSAE 10 (as amended by SSAE No. 11)	AT Section 201 Agreed-Upon Procedures Engagements	-	By SSAE 18 in 2016	AT-C Section 205 Examination Engagements	AT-C Section 206 Direct Examination Engagements was created by SSAE 21 By SSAE 20 and 22	AT-C Section 205 Assertion-Based Examination Engagements AT-C Section 206 - Direct Examination Engagements
SSAE 10 (as amended by SSAE No. 11)	AT Section 301 Financial Forecasts and Projections	By SSAE 17	By SSAE 18 in 2016	AT-C Section 210 Review Engagements		AT-C Section 210 Review Engagements
SSAE 10	AT Section 401 Reporting on Pro Forma Financial Information	-	By SSAE 18 in 2016	AT-C Section 215 Agreed-Upon Procedures Engagements		AT-C Section 215 Agreed-Upon Procedures Engagements
SSAE 10	AT Section 601 Compliance Attestation	-	By SSAE 18 in 2016	AT-C Section 305 Prospective Financial Information		AT-C Section 305 Prospective Financial Information
SSAE 10	AT Section 701 Management's Discussion and Analysis	-	By SSAE 18 in 2016	AT-C Section 310 Reporting on Pro Forma Financial Information		AT-C Section 310 Reporting on Pro Forma Financial Information
			By SSAE 18 in 2016	AT-C Section 315 Compliance Attestation		AT-C Section 315 Compliance Attestation
			By SSAE 18 in 2016	AT-C Section 395 Management's Discussion and Analysis (3)		AT-C Section 395 Management's Discussion and Analysis (3)
New attestation standards issued by the AICPA after April 2003		Effective				
SSAE 13	AT Section 20 Defining Professional Requirements in Statements on Standards for Attestation Engagements	Dec 2005	By SSAE 18 in 2016	Became paragraph 21 of AT-C Section 105		N/A
SSAE 15	AT Section 501 An Examination of an Entity's Internal Control Over Financial Reporting That Is Integrated With an Audit of Its Financial Statements	Dec 15, 2008 (1)	By SSAE 18 in 2016	SSAE 15 was withdrawn when SAS No. 130 became effective on Dec. 15, 2016.		N/A
SSAE 16	AT Section 801 Reporting on Controls at a Service Organization	Jun 15, 2011 (2)	By SSAE 18 in 2016	AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting		AT-C Section 320 Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting

Notes:

- (1) Effective when the subject matter or assertion is as of or for a period ending on or after December 15, 2008. Earlier application was permitted.
- (2) Effective for service auditors' reports for periods ending on or after June 15, 2011. Earlier implementation was permitted.
- (3) SSAE No. 18 does not supersede AT section 701, "Management's Discussion and Analysis," of SSAE No. 10, Attestation Standards:

SSAE 13	Defining Professional Requirements in Statements on Standards for Attestation Engagements
SSAE 14	SSAE Hierarchy
SSAE 15	An Examination of an Entity's Internal Control Over Financial Reporting That Is Integrated With an Audit of Its Financial Statements
SSAE 16	Reporting on Controls at a Service Organization
SSAE 17	Reporting on Compiled Prospective Financial Statements When the Practitioner's Independence is Impaired
SSAE 18	Attestation Standards: Clarification and Recodification
SSAE 19	Agreed-Upon Procedures Engagements
SSAE 20	Amendments to the Description of the Concept of Materiality
SSAE 21	Direct Examination Engagements
SSAE 22	Review Engagements