

**PROPOSED INTERNATIONAL STANDARD ON AUDITING 320
(REVISED AND REDRAFTED)**

MATERIALITY IN PLANNING AND PERFORMING AN AUDIT

(Effective for audits of financial statements for periods beginning on or after ~~[date]~~ December 15, 2009)*

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International Standard on Auditing (ISA) 320 (Revised and Redrafted), “Materiality in Planning and Performing an Audit” should be read in the context of the ~~“Preface to the International Standards on Quality Control, Auditing, Review, Other Assurance and Related Services [proposed] ISA 200 (Revised and Redrafted), “Overall Objective of the Independent Auditor, and the Conduct of an Audit in Accordance with International Standards on Auditing,”~~ which sets out the authority of ISAs. **[ISSUE H]**

* — See footnote 4.

Introduction

Scope of this ISA

1. This International Standard on Auditing (ISA) deals with the auditor's responsibility determination of materiality and its application to apply materiality in planning and performing an audit of financial statements. ISA 450 (Revised and Redrafted)¹, ~~“Evaluation of Misstatements Identified during the Audit”~~ deals with explains how materiality is applied in evaluating the effect of identified misstatements identified during on the audit and of uncorrected misstatements, if any, on the financial statements.

Materiality in the Context of an Audit

2. Financial reporting frameworks often discuss the concept of materiality in the context of the preparation and presentation of financial statements. Although financial reporting frameworks may discuss materiality in different terms, they generally explain that:
 - Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements;
 - Judgments about materiality are made ~~in the~~ light of surrounding circumstances, and are affected by the size or nature of a misstatement, or a combination of both; ~~and~~
 - Judgments about matters that are material to users of the financial statements are based on a consideration of the common financial information needs of users as a group.² The possible effect of misstatements on specific individual users, whose needs may vary widely, is not considered; and (Ref: Para. A1)
 - Judgments about materiality are made in relation to the relevant financial reporting period.
3. Such a discussion, if present in the applicable financial reporting framework, provides a frame of reference to the auditor in determining ~~a materiality level or levels~~ for the audit. If the applicable financial reporting framework does not include a discussion of materiality, the characteristics referred to in paragraph 2 provide the auditor with such a frame of reference.
4. The auditor's determination of ~~a materiality level or levels~~ is a matter of professional judgment, and is affected by the auditor's perception of the financial information needs of users of the financial statements. In this context, ~~it is reasonable for the auditor to assume this~~ ISA is written on the basis that users:

¹ ISA 450 (Revised and Redrafted), “Evaluation of Misstatements Identified during the Audit.”

² For example, the International Accounting Standards Board's the “Framework for the Preparation and Presentation of Financial Statements,” adopted by the International Accounting Standards Board in April 2001, indicates that, for a profit-oriented entity, as investors are providers of risk capital to the enterprise, the provision of financial statements that meet their needs will also meet most of the needs of other users that financial statements can satisfy.

- (a) Have a reasonable knowledge of business and economic activities and accounting and a willingness to study the information in the financial statements with reasonable diligence;
 - (b) Understand that financial statements are prepared, presented and audited to levels of materiality;
 - (c) Recognize the uncertainties inherent in the measurement of amounts based on the use of estimates, judgment and the consideration of future events; and
 - (d) Make reasonable economic decisions on the basis of the information in the financial statements.
5. The concept of materiality is applied by the auditor both in planning and performing the audit, and in evaluating the effect of identified misstatements on the audit and of uncorrected misstatements, if any, on the financial statements and the opinion in the auditor's report. (Ref: Para. A2)
6. In planning the audit, the auditor makes judgments about the size of misstatements that will be considered material. These judgments ~~affect the nature, timing and extent of audit procedures~~ provide a basis for:
- (a) Determining the nature, timing and extent of risk assessment procedures;
 - (b) Identifying and assessing the risks of material misstatement; and
 - (c) Determining the nature, timing and extent of further audit procedures.

The materiality ~~level or levels~~ determined when planning the audit ~~does~~ not necessarily establish a ~~threshold~~ an amount below which uncorrected misstatements ~~identified during the audit,~~ individually or in the aggregate, will always be evaluated as immaterial. The circumstances related to some misstatements may cause the auditor to evaluate them as material even if they are below ~~the materiality level or levels.~~ Although ~~it~~ is not practicable to design audit procedures to detect misstatements that could be material solely because of their nature; ~~however,~~ the auditor considers not only the size but also the nature of ~~any identified~~ uncorrected misstatements, and the particular circumstances of their occurrence, when evaluating their effect on the financial statements³ and the opinion in the auditor's report ~~(ISA 450).~~ **[ISSUE I] [ISSUE J.1]**

Effective Date

7. This ISA is effective for audits of financial statements for periods beginning on or after ~~[date]~~ December 15, 2009.⁴

³ ISA 450 (Revised and Redrafted), paragraph A15.

⁴ ~~This date will not be earlier than December 15, 2008.~~

Objective

8. The objective of the auditor is to ~~determine, and reconsider as the audit progresses, an appropriate~~ apply materiality level or levels to enable the auditor to appropriately in planning and performing the audit. (Ref: Para. A2) [ISSUE A]

Definition

9. For purposes of the ISAs, the following terms have the meaning attributed below:
- (a) Materiality – The materiality level for the financial statements as a whole. [ISSUE B.1]
 - (b) Operational materiality – An amount set by the auditor at less than materiality to reduce to an appropriately low level the probability that the total of uncorrected and undetected misstatements exceeds materiality. [ISSUE B.2]

Requirements

Determining Materiality when Planning the Audit

Materiality Level for the Financial Statements as a Whole

910. When establishing the overall audit strategy, the auditor shall ~~determine a materiality level for the financial statements as a whole for purposes of:~~
- (a) ~~Determining the nature, timing and extent of risk assessment procedures;~~
 - (b) ~~Identifying and assessing the risks of material misstatement; and~~
 - (c) ~~Determining the nature, timing and extent of further audit procedures.~~ (Ref: Para. A3-A10)
[TEXT MOVE TO PARAGRAPH 6]

Materiality Levels for Particular Classes of Transactions, Account Balances or Disclosures

1011. ~~When establishing the overall strategy for the audit, t~~The auditor shall also ~~consider~~ determine whether, in the specific circumstances of the entity, there are particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than ~~the materiality level for the financial statements as a whole~~ could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements. In such circumstances, the auditor shall determine the materiality level or levels to be applied to those particular classes of transactions, account balances or disclosures. The requirements in paragraphs 12-14 shall also apply to the materiality level or levels determined in accordance with this paragraph. (Ref: Para. A11-A12) [ISSUE B.1]

*Amounts Lower than the Materiality Level or Levels for Purposes of Assessing Risks and Designing Further Audit Procedures*Operational Materiality

1112. The auditor shall ~~determine an amount or amounts lower than the materiality level for the financial statements as a whole (and an amount or amounts lower than the materiality level for particular classes of transactions, account balances or disclosures, if applicable)~~ operational materiality for purposes of assessing the risks of material misstatement and ~~designing~~ determining the nature, timing and extent of further audit procedures to respond to assessed risks. (Ref: Para. A13) [ISSUE B.2] [ISSUE I]

Considerations Revision as the Audit Progresses

- ~~1213.~~ The auditor shall ~~revise the materiality level for the financial statements as a whole (and the materiality level for a particular class of transactions, account balance or disclosure, if applicable)~~ in the event of becoming aware of information during the audit that would have caused the auditor to have determined a different materiality ~~level or levels~~ initially. (Ref: Para. A14)
- ~~1314.~~ If the auditor concludes that a lower materiality level or levels than that initially determined are is appropriate, the auditor shall reconsider determine whether it is necessary to revise the lower amount or amounts determined for purposes of assessing risks of material misstatement and designing further audit procedures operational materiality, and whether the appropriateness of the nature, timing and extent of the further audit procedures remain appropriate.

Documentation

- ~~1415.~~ The auditor shall document the following amounts and the factors considered in their determination:
- (a) ~~The m~~Materiality level for the financial statements as a whole (see paragraph ~~9~~ 10);
 - (b) The materiality level for a particular class of transactions, account balance or disclosure, if applicable (see paragraph ~~10~~ 11);
 - (c) ~~The amount or amounts determined for purposes of assessing risks of material misstatement and designing further audit procedures~~ Operational materiality (see paragraph ~~11~~ 12); and
 - (d) ~~Any changes made to~~ revision of (a)-(c) as the audit progressed (see paragraphs ~~12-13~~ 13-14).

* * *

Application and Other Explanatory Material**Materiality in the Context of an Audit** (Ref: Para. 2)*Considerations Specific to Public Sector Entities*

- A1. In the case of a public sector entity, legislators and regulators are often the primary users of its financial statements. Furthermore, the financial statements may be used to make decisions other than economic decisions.

Materiality and Audit Risk (Ref: Para. ~~85~~)

- A2. ~~ISA 200, "Objective and General Principles Governing an Audit of Financial Statements,"~~ requires the auditor to plan and perform the audit to reduce audit risk to an acceptably low level that is consistent with the objective of an audit The overall objectives of the auditor are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, thereby enabling the auditor to express an opinion on whether the financial statements are prepared, in all material respects, in accordance with an applicable financial reporting framework; and to report in accordance with the auditor's

findings.⁵ The auditor obtains reasonable assurance by reducing audit risk to an acceptably low level, through accumulating and evaluating sufficient appropriate audit evidence. Audit risk is the risk that the auditor expresses an inappropriate audit opinion when the financial statements are materially misstated. Audit risk is a function of the risk of material misstatement of the financial statements and the risk that the auditor will not detect such misstatement. Materiality and audit risk are considered throughout the audit, in particular, when:

- (a) Identifying and assessing the risks of material misstatement ~~(see ISA 315 (Redrafted), “Identifying and Assessing the Risks of Material Misstatements Through Understanding the Entity and Its Environment”);⁶~~
- (b) Determining the nature, timing and extent of further audit procedures ~~(see ISA 330 (Redrafted), “The Auditor’s Responses to Assessed Risks”);⁷ and~~
- (c) Evaluating the effect of uncorrected misstatements, if any, on the financial statements and the opinion in the auditor’s report ~~(see ISA 450).⁸~~

Determining Materiality when Planning the Audit

Considerations Specific to Public Sector Entities (Ref: Para.10)

A3. The determination of materiality ~~level or levels~~ in an audit of the financial statements of a public sector entity is influenced by legislative and regulatory requirements, and by the financial information needs of legislators and the public in relation to public sector programs.

Materiality Level for the Financial Statements as a Whole

Use of Benchmarks in Determining Materiality (Ref: Para. ~~9~~ 10) **ISSUE I**

A4. Determining ~~a materiality level for the financial statements as a whole~~ requires involves the exercise of professional judgment. A percentage is often applied to a chosen benchmark as a starting point in that determination. Factors that may affect the identification of an appropriate benchmark include the following:

- The elements of the financial statements (for example, assets, liabilities, equity, income, expenses);
- Whether there are items on which the attention of the users of the particular entity’s financial statements tends to be focused (for example, for the purpose of evaluating financial performance users may tend to focus on profit, revenue or net assets);
- The nature of the entity, where the entity is ~~at~~ in its life cycle, and the industry and economic environment in which the entity operates;

⁵ [Proposed] ISA 200 (Revised and Redrafted), “ISA 200 (Revised and Redrafted), “Overall Objective of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing.” paragraph [12].

⁶ ISA 315 (Redrafted), “Identifying and Assessing the Risks of Material Misstatements Through Understanding the Entity and Its Environment.”

⁷ ISA 330 (Redrafted), “The Auditor’s Responses to Assessed Risks.”

⁸ ISA 450 (Revised and Redrafted).

- The entity's ownership structure and the way it is financed (for example, if an entity is financed solely by debt rather than equity, users may put more emphasis on assets, and claims on them, than on the entity's earnings); and
 - The relative volatility of the benchmark.
- A5. Examples of benchmarks that may be appropriate, depending on the circumstances of the entity, include categories of reported income such as profit before tax, total revenue, gross profit and total expenses, total equity or net asset value. Profit before tax from continuing operations is often used for profit-oriented entities. When profit before tax from continuing operations is volatile, other benchmarks may be more appropriate, such as gross profit or total revenues.
- A6. ~~When an appropriate benchmark has been identified, relevant financial data to be used in determining the materiality level for the financial statements as a whole is identified.~~ In relation to the chosen benchmark, Relevant financial data ordinarily includes prior periods' financial results and financial positions, the period-to-date financial results and financial position, and budgets or forecasts for the current period, adjusted for significant changes in the circumstances of the entity (for example, a significant business acquisition) and relevant changes of conditions in the industry or economic environment in which the entity operates. For example, when, as a starting point, ~~the materiality level~~ is determined for a particular entity based on a percentage of profit before tax from continuing operations, circumstances that give rise to an exceptional decrease or increase in such profit may lead the auditor to conclude that ~~the materiality level~~ is more appropriately determined using a normalized profit before tax from continuing operations figure based on past results.
- A7. ~~The materiality level is determined in relation~~ relates to the financial statements on which the auditor is reporting. Where the financial statements are prepared for a financial reporting period of more or less than twelve months, such as may be the case for a new entity or a change in the financial reporting period, ~~the materiality level is determined in relation~~ relates to the financial statements prepared for that financial reporting period.
- A8. Determining a percentage to be applied to a chosen benchmark ~~requires~~ involves the exercise of professional judgment. There is a relationship between the percentage and the chosen benchmark, such that a percentage applied to profit before tax from continuing operations will normally be higher than a percentage applied to total revenue. For example, the auditor may consider five percent of profit before tax from continuing operations to be appropriate for a profit-oriented entity in a manufacturing industry, while the auditor may consider one percent of total revenue or total expenses to be appropriate for a not-for-profit entity. Higher or lower percentages, however, may be deemed appropriate in the circumstances.

Considerations Specific to Small Entities

- A9. When an entity's profit before tax from continuing operations is consistently nominal, as might be the case for an owner-managed business where the owner takes much of the profit before tax in the form of remuneration, a benchmark such as profit before remuneration and tax may be more relevant.

Considerations Specific to Public Sector Entities

A10. In an audit of a public sector entity, total cost or net cost (expenses less revenues or expenditure less receipts) may be appropriate benchmarks for program activities. Where a public sector entity has custody of public assets, assets may be an appropriate benchmark.

Materiality Levels for Particular Classes of Transactions, Account Balances or Disclosures

(Ref: Para. ~~10~~ 11)

A11. Factors that may affect the auditor's consideration of whether to determine lower materiality level or levels to be applied to particular classes of transactions, account balances or disclosures include the following:

- Whether law, regulations or the applicable financial reporting framework affect users' expectations regarding the measurement or disclosure of certain items (for example, related party transactions, and the remuneration of management and those charged with governance).
- The key disclosures in relation to the industry in which the entity operates (for example, research and development costs for a pharmaceutical company).
- Whether attention is focused on a particular aspect of the entity's business that is separately disclosed in the financial statements (for example, a newly acquired business).

A12. In considering whether, in the specific circumstances of the entity, such classes of transactions, account balances or disclosures exist, the auditor may find it useful to obtain an understanding of the views and expectations of those charged with governance and management.

Amounts Lower than the Materiality Level or Levels for Purposes of Assessing Risks and Designing Further Audit Procedures—Operational Materiality (Ref: Para. ~~11~~ 12)

A13. Planning the audit solely to detect individually material misstatements overlooks the fact that the aggregate of individually immaterial misstatements may cause the financial statements to be materially misstated, and leaves no margin for possible undetected misstatements. ~~The amount or amounts the auditor determines for purposes of assessing the risks of material misstatement and designing further audit procedures to respond to assessed risks~~ Operational materiality is set to reduce to an appropriately low level the probability that the total of uncorrected and undetected misstatements in the financial statements exceeds ~~the materiality level or levels~~. The determination of ~~this amount or amounts~~ operational materiality is not a simple mechanical calculation and ~~requires the auditor to~~ involves the exercise of professional judgment. It is affected by the auditor's understanding of the entity, updated during the ~~execution~~ performance of the risk assessment procedures, and by the nature and extent of misstatements accumulated in previous audits (for example, for an entity with a history of large or numerous misstatements accumulated in previous audits, ~~the amount or amounts so determined~~ operational materiality would be lower than if such misstatements were not present).

Considerations—Revision as the Audit Progresses (Ref: Para. ~~12~~ 13)

A14. ~~The m~~Materiality level for the financial statements as a whole (or the materiality level for a particular class of transactions, account balance or disclosure, if applicable) may need to be revised as a result of a change in circumstances that occurred during the audit (for example, a

decision to dispose of a major part of the entity's business), new information, or a change in the auditor's understanding of the entity and its operations as a result of performing further audit procedures. For example, if during the audit it appears as though actual financial results are likely to be substantially different from the anticipated period end financial results that were used initially to determine ~~the materiality level or levels~~, the auditor ~~may need to revise~~ the materiality level or levels.

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