

PROPOSED INTERNATIONAL STANDARD ON AUDITING 265 COMMUNICATING DEFICIENCIES IN INTERNAL CONTROL

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

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Proposed International Standard on Auditing (ISA) 265, “Communicating Deficiencies in Internal Control” should be read in conjunction with ~~proposed~~ ISA 200 (Revised and Redrafted), “Overall Objectives of the Independent Auditor,” and the Conduct of an Audit in Accordance with International Standards on Auditing.”

Introduction

Scope of this ISA

1. This International Standard on Auditing (ISA) deals with the auditor's responsibility to communicate appropriately to management and those charged with governance deficiencies in internal control¹ that the auditor has identified in an audit of ~~the~~ financial statements. This ISA does not ~~address deficiencies in internal control the potential financial effects of which are clearly trivial.~~² impose additional responsibilities on the auditor regarding obtaining an understanding of internal control and designing and performing tests of controls over and above the requirements of ISA 315 (Redrafted) and ISA 330 (Redrafted).² ISA 260 (Revised and Redrafted)³ establishes further requirements and provides guidance regarding the auditor's responsibility to communicate with those charged with governance in relation to the audit.

Rationale for Communicating Deficiencies in Internal Control

2. The auditor is required to obtain an understanding of internal control relevant to the audit when identifying and assessing the risks of material misstatement.⁴ In making those risk assessments, the auditor considers internal control in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control. The auditor may identify deficiencies in internal control not only during this risk assessment process but also at any other stage of the audit. Knowledge of those deficiencies ~~in internal control~~ is likely to be relevant to management and those charged with governance in fulfilling their respective responsibilities in relation to the financial reporting process. This ISA therefore establishes communication responsibilities for the auditor regarding identified deficiencies in internal control.
3. Nothing in this ISA precludes the auditor from communicating to those charged with governance and management other internal control matters that the auditor has identified during the audit ~~that are not relevant to the audit but that the auditor considers important.~~

Effective Date

4. This ISA is effective for audits of financial statements for periods beginning on or after ~~December 15, 2009~~.

¹ ISA 315 (Redrafted), "Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment," paragraph 4, defines the terms "internal control" and "controls."

² ~~[Proposed] ISA 450 (Revised and Redrafted), "Evaluation of Misstatements Identified during the Audit," paragraph [A1], describes the meaning of "clearly trivial."~~

² ISA 330 (Redrafted), "The Auditor's Responses to Assessed Risks."

³ ISA 260 (Revised and Redrafted), "Communication with Those Charged with Governance."

⁴ ISA 315 (Redrafted) paragraph 12. Paragraphs A56-A61 provide guidance on controls relevant to the audit.

Objective

5. The objective of the auditor is to communicate appropriately to ~~management or~~ those charged with governance and management deficiencies in internal control ~~relevant to the audit~~ that the auditor has identified during the audit and that, in the auditor's professional judgment, are of sufficient importance to merit their respective attentions.

Definitions

6. For purposes of the ISAs, the following terms have the meanings attributed below:
 - (a) Deficiency in internal control – This exists when:
 - (i) A control ~~that is either missing or~~ is designed, implemented or operated in such a way that it is unable to prevent, or detect and correct, misstatements in the financial statements on a timely basis; ~~or~~
 - (ii) A control necessary to prevent, or detect and correct, misstatements in the financial statements on a timely basis is missing.
 - (b) Significant deficiency in internal control – A deficiency or combination of deficiencies in internal control ~~relevant to the audit~~ that, in the auditor's professional judgment, is of sufficient importance to merit the attention of those charged with governance. (Ref: Para. A5)

Requirements

Identification of Deficiencies in Internal Control

7. The auditor shall determine whether, on the basis of the audit work performed, the auditor has identified one or more deficiencies in internal control. In making this determination, the auditor shall seek to agree the relevant facts and circumstances of the auditor's findings with the appropriate level of management, unless it would be inappropriate to do so in the circumstances. (Ref: Para. A1-A~~43~~)
8. If the auditor has identified one or more deficiencies in internal control, the auditor shall determine, on the basis of the audit work performed, whether, individually or in combination, they constitute significant deficiencies in internal control. (Ref: Para. A~~54~~-A~~118~~)

Communication of Deficiencies in Internal Control

- ~~9~~10. The auditor shall communicate in writing significant deficiencies in internal control identified during the audit to those charged with governance ~~in writing and~~ on a timely basis. (Ref: Para. A~~124~~-A18, A~~3022~~)
- ~~10~~11. The auditor shall include in the written communication of significant deficiencies in internal control:
 - (a) A description of the deficiencies and an explanation of their potential effects; and (Ref: Para. A19)

- (b) Sufficient information to enable those charged with governance to understand the context of the communication. In particular, the auditor shall explain that: (Ref: Para. A20-A21)
- (i) The purpose of the audit was for the auditor to express an audit opinion on the financial statements, and the auditor has not performed audit procedures to obtain reasonable assurance, and is not providing any assurance, on the effectiveness of internal control;
 - (ii) The auditor did not plan and perform the audit with a view to identifying all deficiencies in internal control that might exist; and
 - (iii) The matters being reported are limited to those deficiencies that the auditor has identified during the audit and that the auditor has concluded are of sufficient importance to merit being reported to those charged with governance; ~~and~~

119. The auditor shall also communicate ~~all deficiencies in internal control (other than those that are clearly trivial) identified during the audit~~ to management at an appropriate level of responsibility on a timely basis: (Ref: Para. A22, A30)

- (a) In writing, significant deficiencies in internal control that the auditor has communicated or intends to communicate to those charged with governance, unless it would be inappropriate to communicate directly to management in the circumstances; and (Ref: Para. A14, A23-A24)
- (b) Other deficiencies in internal control identified during the audit that have not otherwise been already communicated to management by other parties and that, in the auditor's professional judgment, are of sufficient importance to merit management's attention; unless: (Ref: Para. ~~A9-A25~~, ~~A27~~)
- ~~(a) The auditor has obtained sufficient appropriate audit evidence about the operating effectiveness of other controls that would prevent, or detect and correct, misstatements arising from the identified deficiencies; or (Ref: Para. A3, A12)~~
- ~~(b) It would be inappropriate to communicate directly to management in the circumstances. (Ref: Para. A13)~~

12. If the auditor has communicated to management deficiencies in internal control other than significant deficiencies in internal control, the auditor shall inform those charged with governance of that fact unless all of those charged with governance are involved in managing the entity. (Ref: Para. A28-A29)

Application and Other Explanatory Material

~~Identification of Deficiencies in Internal Control~~ (Ref: Para. 7)

Determination of Whether Deficiencies in Internal Control Have Been Identified (Ref: Para. 7)

- A1. ~~Deficiencies in internal control may be identified at any stage of the audit. In determining whether the auditor has identified one or more deficiencies, the auditor may seek to agree the relevant facts and circumstances of the auditor's findings with management. Doing so also~~ The level of management with whom it is appropriate to discuss the findings is one who is familiar with the internal control area concerned and who has the authority to take remedial action on any identified deficiencies in internal control. Discussing the relevant facts and circumstances of the auditor's findings with the appropriate level of management provides an opportunity for the auditor to alert management on a timely basis to the existence of deficiencies of which management may not have been previously aware. In rare circumstances, it may not be appropriate to discuss the findings directly with management, for example, when the findings appear to call management's integrity or competence into question (see paragraph A23).
- A2. In ~~agreeing~~ discussing the facts and circumstances of the auditor's findings with management, the auditor may obtain other relevant information for further consideration, such as:
- Management's understanding of the actual or suspected causes of the deficiencies.
 - Exceptions arising from the deficiencies that management may have noted, for example, misstatements that were not prevented by the relevant information technology (IT) controls.
 - A preliminary indication from management of its response to the findings.

~~A3. Management may also inform the auditor of controls not previously known to the auditor that it believes would prevent, or detect and correct, potential misstatements that would not be caught by the control(s) giving rise to the deficiencies. The existence of these other controls does not change the fact that the auditor has identified deficiencies in internal control. This ISA does not require the auditor to obtain audit evidence regarding the design and operating effectiveness of these other controls. In concluding whether deficiencies in internal control exist, the auditor is, however, not precluded from obtaining and evaluating additional audit evidence regarding such other controls.~~

Considerations Specific to Smaller Entities

A3. A relevant consideration when determining whether deficiencies in internal control have been identified in the audit of a smaller entity is that the concepts underlying control activities in small entities are likely to be similar to those in larger entities, but the formality with which they operate will vary. Further, smaller entities may find that certain types of control activities are not necessary because of controls applied by management. For example, management's sole authority for granting credit to customers and approving

significant purchases can provide strong control over important account balances and transactions, lessening or removing the need for more detailed control activities.

A4. Also, smaller entities often have fewer employees which may limit the extent to which segregation of duties is practicable. However, in a small owner-managed entity, the owner-manager may be able to exercise more effective oversight than in a larger entity. This oversight may compensate for the generally more limited opportunities for segregation of duties. In the smaller entity context, however, the higher level of management oversight needs to be balanced against the greater potential for management override of controls. Accordingly, while the higher level of management oversight in a smaller entity may compensate for, and therefore reduce the severity of, certain deficiencies in internal control, it does not mitigate the higher risk of material misstatement arising from the greater opportunity that management has to override controls.

Definition of Significant Deficiency in Internal Control and Determination of Whether Identified Deficiencies in Internal Control Constitute Significant Deficiencies in Internal Control (Ref: Para. 6(b), 8)

~~A4. MOVED TO PARA A8.~~

A5. ~~Significant deficiencies may exist even though the auditor has not identified misstatements during the audit.~~ The significance of a deficiency or a combination of deficiencies in internal control, and therefore whether it is of sufficient importance to merit the attention of those charged with governance, depends not only on whether a misstatement has actually occurred, but also on the ~~risk likelihood~~ that a misstatement could occur and the potential magnitude of the misstatement. Significant deficiencies in internal control may therefore exist even though the auditor has not identified misstatements during the audit.

~~A67.~~ Examples of ~~other~~ matters that the auditor may consider in determining whether a deficiency or combination of deficiencies in internal control constitutes a significant deficiency in internal control include:

- Whether the deficiencies are likely to lead to material misstatements in the financial statements in the future.
- The susceptibility to loss or fraud of the related asset or liability.
- The subjectivity and complexity of determining estimated amounts, such as ~~those involving~~ fair values accounting estimates.
- The financial statement amounts exposed to the deficiencies.
- The volume of activity that has occurred or could occur in the account balance or class of transactions exposed to the deficiency or deficiencies.
- The importance of the controls to the financial reporting process; for example:
 - General monitoring controls (such as oversight of management).
 - Controls over the prevention and detection of fraud.
 - Controls over the selection and application of significant accounting policies.

- Controls over significant transactions with related parties.
- Controls over significant transactions outside the entity's normal course of business.
- Controls over the period-end financial reporting process (such as controls over non-recurring journal entries).
- The cause and frequency of the exceptions detected as a result of the deficiencies in the controls.
- The interaction of the deficiency in internal control with other deficiencies in internal control.

A76. Indicators of significant deficiencies in internal control include, for example:

- Deficiencies in Evidence of ineffective aspects of the control environment, such as:
 - Ineffective oversight of the financial reporting process-Indications that significant transactions in which management is financially interested are not being appropriately scrutinized by those charged with governance, ~~especially in an environment with limited segregation of duties.~~
 - Identification of management fraud, whether or not material, that was not prevented by the entity's internal control.
- Absence of a risk assessment process within the entity where such a process would ordinarily be expected to have been established.
- A deficiency in a control over a significant riskEvidence of an ineffective entity risk assessment process, such as management's failure to identify a risk of material misstatement that the auditor would expect the entity's risk assessment process to have identified.
- Evidence of an ineffective response to identified risks (e.g. absence of controls over a significant risk of material misstatement).
- Material mMisstatements detected by the auditor's procedures that were not identified prevented, or detected and corrected, by the entity's internal control.
- Restatement of previously issued financial statements to reflect the correction of a material misstatement due to error or fraud.
- Evidence of management's inability to oversee the preparation of the financial statements.
- Management's failure to implement remedial action on significant deficiencies in internal control previously communicated, without rational explanations.

A84. Controls may be designed to operate individually or in combination to effectively prevent, or detect and correct, misstatements.⁵ For example, controls in an IT subsystem over accounts

⁵ ISA 315 (Redrafted), paragraph A62.

receivable may consist of both automated and manual controls designed to operate together to prevent, or detect and correct, misstatements in the ~~relevant~~ account balances. A deficiency in internal control on its own may not be sufficiently important to constitute a significant deficiency in internal control. However, a combination of deficiencies affecting the same account balance or disclosure, relevant assertion, or component of internal control may increase the risks of misstatement to such an extent as to give rise to a significant deficiency in internal control.

- ~~A98.~~ Law or regulation in some jurisdictions may establish a requirements for the auditor (particularly for audits of listed entities) for the auditor to communicate to those charged with governance or to other relevant parties (such as regulators) ~~details of specific types of deficiencies in internal control that the auditor has identified during the audit, and may define terms such as “material weakness” for this purpose one or more specific types of deficiency in internal control that the auditor has identified during the audit.~~ Where law or regulation has established specific terms and definitions for these types of deficiency in internal control and requires the auditor to use these terms and definitions for the purpose of the communication, the auditor uses such terms and definitions when communicating in accordance with the legal or regulatory requirement.
- ~~A10.~~ Where the jurisdiction has established specific terms for the types of deficiency in internal control to be communicated but has not defined such terms, it may be necessary for the auditor to use judgment to determine the matters to be communicated further to the legal or regulatory requirement. In doing so, the auditor may consider it appropriate to have regard to the requirements and guidance in this ISA. For example, if the purpose of the legal or regulatory requirement is to bring to the attention of those charged with governance certain internal control matters of which they should be aware, it may be appropriate to regard such matters as being generally equivalent to the significant deficiencies in internal control required by this ISA to be communicated to those charged with governance.
- ~~A11.~~ Except to the extent that law or regulation requires the auditor to use specific terms or definitions when communicating certain deficiencies in internal control to those charged with governance or to other relevant parties, the requirements of this ISA remain applicable. Accordingly, all matters required by this ISA to be communicated to those charged with governance are communicated by the auditor as part of, or in addition to, those matters communicated in accordance with law or regulation.
- ~~A9.~~ The auditor may identify deficiencies in certain controls that do not relate directly to the financial reporting objective of internal control. These controls may, nevertheless, be relevant to the audit if they address in particular the completeness and accuracy of information produced by the entity that the auditor intends to use in designing and performing audit procedures. For example, it is appropriate to communicate to management, in accordance with paragraph 9, a deficiency in a control that did not detect the use of a superseded price list by the entity’s computerized sales system, resulting in lower margins than would be expected.

Communication of Deficiencies in Internal Control

Communication of Identified Deficiencies to Management (Ref: Para. 9)

~~A10. MOVED TO PARA A17.~~

~~A11. MOVED TO PARA A16.~~

Communication of Significant Deficiencies in Internal Control to Those Charged with Governance (Ref: Para. 9+0)

- A~~12~~14. Communicating significant deficiencies in internal control in writing to those charged with governance ~~in writing~~ reflects the importance of these matters to the financial reporting process, and assists those charged with governance in fulfilling their oversight responsibilities relating to overseeing the financial reporting process. ~~The communication may include details of any proposed remedial action from management, together with a statement as to whether the auditor has undertaken any steps to verify that such action has been implemented.~~ ISA 260 (Revised and Redrafted) establishes relevant considerations regarding communication with those charged with governance when all of them are involved in managing the entity.⁶
- A~~13~~5. In determining when to issue the written communication ~~to those charged with governance~~, the auditor may consider ~~that whether~~ receipt of such communication would be an important factor in enabling those charged with governance to discharge their oversight responsibilities. ~~Further~~ In addition, for listed entities in certain jurisdictions, those charged with governance may need to receive the auditor's written communication before the date of approval of the financial statements in order to discharge specific responsibilities in relation to internal control for regulatory or other purposes. For other entities, the auditor may issue the written communication at a later date. Nevertheless, in the latter case, as the auditor's written communication of significant deficiencies in internal control forms part of the final audit file, the written communication is subject to the overriding requirement⁷ for the auditor to complete the assembly of the final audit file on a timely basis.⁸ ISA 230 (Redrafted) states that an appropriate time limit within which to complete the assembly of the final audit file is ordinarily not more than 60 days after the date of the auditor's report.
- A~~14~~6. Regardless of the timing of the written communication of significant deficiencies in internal control ~~to those charged with governance~~, the auditor may communicate these orally in the first instance to management and, when ~~the auditor considers it appropriate to do so~~, to those charged with governance. ~~This may to~~ assist them in taking timely remedial action to minimize the risks of material misstatement. Doing so, however, does not relieve the auditor of the responsibility to communicate the significant deficiencies in internal control in writing ~~to those charged with governance~~, as paragraph 10 this ISA requires.

⁶ ISA 260 (Revised and Redrafted), paragraph 9.

⁷ ISA 230 (Redrafted), "Audit Documentation," paragraph 14.

⁸ ~~ISA 230 (Redrafted), paragraph A21, states that an appropriate time limit within which to complete the assembly of the final audit file is ordinarily not more than 60 days after the date of the auditor's report.~~

A157. The level of detail at which to communicate significant deficiencies in internal control ~~to those charged with governance~~ is a matter of the auditor's professional judgment in the circumstances. Factors that the auditor may consider in determining an appropriate level of detail for the communication include, for example:

- The nature ~~and size~~ of the entity. For instance, the communication required for a public interest entity may be different from that for a non-public interest entity.
- The size and complexity of the entity. For instance, the communication required for a complex entity may be different from that for an entity operating a simple business.
- The nature ~~and volume~~ of significant deficiencies in internal control that the auditor has identified.
- The entity's governance ~~structure~~ composition. For instance, more detail may be needed if those charged with governance include members who do not have significant experience in the entity's industry or in the affected areas.
- ~~The nature of the oversight responsibilities of those charged with governance.~~
- ~~The preferences of those charged with governance.~~
- Legal or regulatory requirements regarding the communication of specific types of deficiencies ~~ies~~ in internal control.
- ~~Whether the significant deficiencies were communicated to those charged with governance in previous audits.~~
- ~~Whether those charged with governance already had knowledge of the significant deficiencies through other means, such as from relevant internal audit reports.~~

A164. Management and those charged with governance may already be aware of significant deficiencies in internal control that the auditor has identified during the audit and may have chosen not to remedy them because of cost or other considerations. The responsibility for evaluating the costs and benefits of implementing remedial action rests with management and those charged with governance. Accordingly, the requirement in paragraph 9 for the auditor to communicate deficiencies to management applies regardless of cost or other considerations that management and those charged with governance may consider relevant in determining whether to remedy such deficiencies.

A170. ~~How the auditor communicates a deficiency may be influenced by whether the auditor has communicated it in a previous audit, or whether management already has knowledge of it. The fact that the auditor communicated a significant deficiency in internal control to those charged with governance and management in a previous audit does not eliminate the need for the auditor to repeat the communication if remedial action has not yet been taken. If the auditor has a previously communicated the matter to management significant deficiency in internal control remains, the current year's communication may include repeat the same description of the deficiency as from the previously communicationed, or simply reference the previous communication. Alternatively, it may be summarized, specifically referring to the previous communication. However, the fact that the auditor communicated a deficiency~~

~~to management in a previous audit, or that management already had knowledge of the deficiency through other means (such as from relevant work done by internal auditors), does not eliminate the need for the auditor to repeat the communication if remedial action has not yet been taken.~~ The auditor may ask management or, where appropriate, those charged with governance, why the significant deficiency in internal control has not yet been remedied. A failure to act, in the absence of a rational explanation, may in itself represent a significant deficiency in internal control.

~~A12. Unless the auditor has obtained sufficient appropriate audit evidence about the operating effectiveness of other controls that would prevent, or detect and correct, misstatements arising from the identified deficiencies, the auditor does not have sufficient audit evidence to conclude that a deficiency in internal control does not exist. Audit evidence regarding the effective design and implementation of such other controls is not in itself sufficient to support such a conclusion.~~

~~A13. MOVED TO PARA A23.~~

~~A18. MOVED TO PARA A27.~~

Considerations Specific to Smaller Entities

A18. In the case of audits of smaller entities, the auditor may communicate in a less structured manner with those charged with governance than in the case of larger entities. For example, in some circumstances the requirement to communicate in writing may be satisfied by setting out the matters in electronic mail rather than a formal letter or report.

Content of Written Communication of Significant Deficiencies in Internal Control (Ref: Para. 10⁺)

A19. In explaining the potential effects of the significant deficiencies in internal control, the auditor need not quantify those effects. The significant deficiencies in internal control may be grouped together for reporting purposes where it is appropriate to do so. The auditor may also include in the written communication suggestions for remedial action on the deficiencies, management's actual or proposed responses, and a statement as to whether or not the auditor has undertaken any steps to verify whether management's responses have been implemented.

A20. The auditor may consider it appropriate to include the following information as additional context for the communication:

- An indication that if the auditor had performed more extensive ~~audit~~ procedures on internal control, the auditor might have identified more deficiencies in internal control to be reported, or concluded that some of the reported deficiencies in internal control need not, in fact, have been reported.
- An indication that such communication has been provided for the purposes of ~~management and~~ those charged with governance, and that it may not be suitable for other purposes.

A21. ~~Laws or regulations~~ may require the auditor or management to furnish a copy of the auditor's written communication on significant deficiencies in internal control to

appropriate regulatory authorities. Where this is the case, the auditor's written communication may identify such regulatory authorities.

Communication of Deficiencies in Internal Control to Management (Ref: Para. 11)

A22. Ordinarily, the appropriate level of management to whom to communicate is the one that has responsibility and authority to evaluate the deficiencies in internal control and to take the necessary remedial action. For significant deficiencies in internal control, the appropriate level is the chief executive officer or chief financial officer (or equivalent) as these matters are also required to be communicated to those charged with governance. For other deficiencies in internal control, the appropriate level may be operational management with more direct involvement in the control areas affected and with the authority to take appropriate remedial action.

Communication of Significant Deficiencies in Internal Control to Management (Ref: Para. 11(a))

A23. It may be inappropriate to communicate identified deficiencies directly to management in limited situations that call into question the integrity or competence of management. For example, there may be evidence of ~~actual or suspected~~ fraud or intentional non-compliance with law or regulation by on-management's part, or management may exhibit an inability to oversee the preparation of adequate financial statements that may raise doubt about management's competence. By virtue of their nature, these deficiencies merit the attention of those charged with governance. They are therefore significant deficiencies in internal control. Accordingly, paragraph 9 requires the auditor to communicate them to those charged with governance.

A24. ISA 250 (Redrafted) establishes requirements and provides guidance on the reporting of identified or suspected non-compliance with laws or regulations, including when those charged with governance are themselves involved in such non-compliance.⁹ ISA 240 (Redrafted) establishes requirements and provides guidance regarding communication to those charged with governance when the auditor has identified fraud or suspected fraud involving management.¹⁰

Communication of Other Deficiencies in Internal Control to Management (Ref: Para. 11(b))

A25. During the audit, the auditor may identify other deficiencies in internal control that are not significant deficiencies in internal control but that may be of sufficient importance to merit management's attention. The determination as to which other deficiencies in internal control merit management's attention is a matter of professional judgment in the circumstances, taking into account the likelihood and potential magnitude of misstatements that may arise in the financial statements as a result of those deficiencies in internal control. Where the auditor judges that a deficiency in internal control does not merit

⁹ ISA 250 (Redrafted), "Consideration of Laws and Regulations in an Audit of Financial Statements," paragraphs 22-28.

¹⁰ ISA 240 (Redrafted), "The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements," paragraph 41.

management's attention, that deficiency in internal control is inconsequential. Accordingly, inconsequential deficiencies in internal control need not be communicated to management.

- A26. The communication of other deficiencies in internal control that merit management's attention need not be in writing but may be oral. Where the auditor has discussed the facts and circumstances of the auditor's findings with management, the auditor may consider an oral communication of the other deficiencies to have been made to management at the time of these discussions. Accordingly, a formal communication need not be made subsequently. However, the auditor may find it helpful to document the discussions with management, including the nature of the matters discussed.
- A27. If the auditor has communicated deficiencies in internal control other than significant deficiencies in internal control to management in a prior period and management has chosen not to remedy them for cost or other reasons, the auditor need not repeat the communication in the current period. The auditor is also not required to repeat information about such deficiencies if it has been previously communicated to management by other parties, such as internal auditors or regulators. It may, however, be appropriate for the auditor to re-communicate these other deficiencies if there has been a change of management, or if new information has come to the auditor's attention that alters the prior understanding of the auditor and management regarding the deficiencies. Nevertheless, the failure of management to remedy other deficiencies in internal control that were previously communicated may become a significant deficiency in internal control requiring communication with those charged with governance. Whether this is the case depends on the auditor's judgment in the circumstances.

Informing Those Charged with Governance of the Communication of Other Deficiencies in Internal Control to Management (Ref: Para. 12)

- A128. Informing those charged with governance of the communication of other deficiencies in internal control to management assists those charged with governance in fulfilling their oversight responsibilities. The auditor may also communicate other control deficiencies to those charged with governance, whether in summarized form or as otherwise agreed. For example, ~~i~~¹¹ in some circumstances, those charged with governance may prefer to know of all deficiencies communicated to management⁴. In other circumstances, those charged with governance may wish to be made aware of the details of all these other deficiencies in internal control or may prefer ~~only to be~~ briefly informed descriptions or summaries of the nature of the other deficiencies in internal control. Where this is the case, the auditor may report orally or in writing to those charged with governance as appropriate.
- A29. ISA 260 (Revised and Redrafted) establishes relevant considerations regarding communication with those charged with governance when all of them are involved in managing the entity.¹¹

¹¹ ISA 260 (Revised and Redrafted), paragraph 9.

Considerations Specific to Public Sector Entities (Ref: Para. 9 and 11)

A~~3022~~. Public sector auditors may have additional responsibilities to communicate deficiencies in internal control that the auditor has identified during the audit, in ways, at a level of detail and to parties not envisaged in this ISA. For example, significant deficiencies in internal control may have to be communicated to the legislature or other governing body. Legislation may also mandate that public sector auditors report deficiencies in internal control, irrespective of the significance of the potential effects of those deficiencies. Further, legislation may require public sector auditors to report on broader internal control-related matters than the deficiencies in internal control required to be communicated by this ISA, for example, controls related to compliance with legislative authorities, regulations, or provisions of contracts or grant agreements.