

Meeting audit oversight requirements and expectations: a comparison of reporting practices

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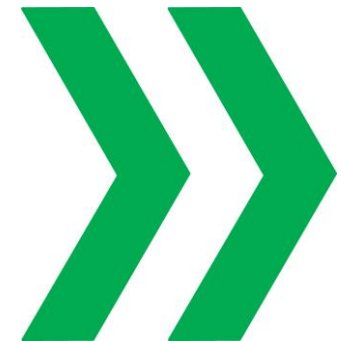
24-25 October 2017, Vienna, Austria

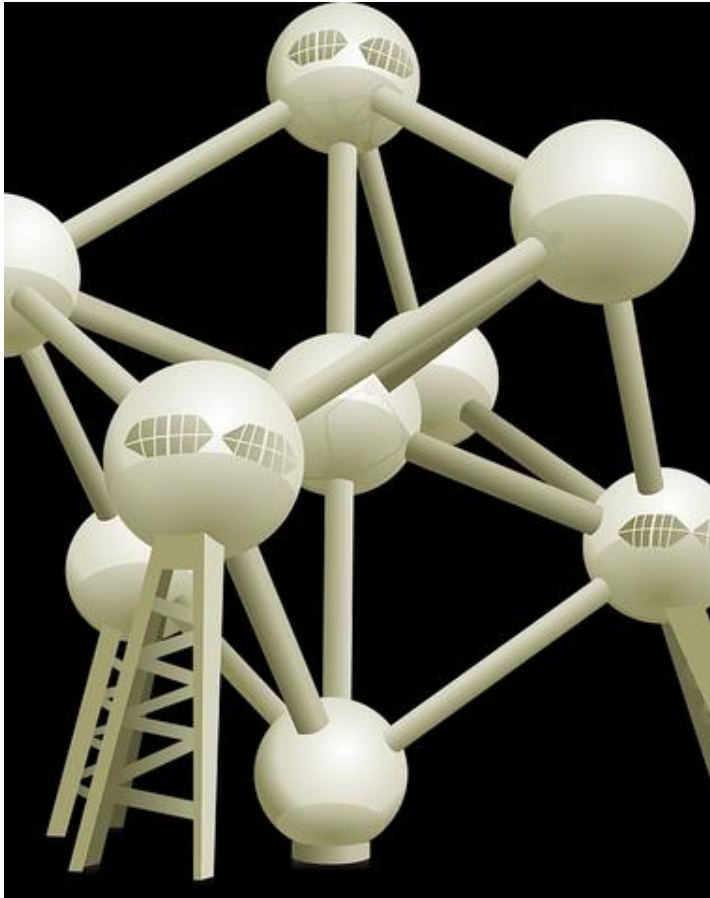
CFRR»

**Centre for Financial
Reporting Reform**



WORLD BANK GROUP
Governance





- »Recap
- »Good practices
- »Survey results
- »Q&A

IFIAR
Principle 3

Audit regulators should be **transparent** and **accountable**.

Transparency should include the publication of **annual work plans** and **activity reports**, including the **outcome of inspections** either in the **aggregate** or on a **firm by firm basis**.



EU Requirements

EU Directive 2014/56

The competent authority shall be transparent. This shall include the publication of annual work programmes and activity reports

Article 28 of Regulation (EU No 537/2014)

Competent authorities shall at least publish:

- (a) annual activity reports
- (b) annual work programmes
- (c) a report on the overall results of the quality assurance system on an annual basis. It shall also include quantitative information and other key performance information on financial resources and staffing, and the efficiency and effectiveness of the quality assurance system;
- (d) the aggregated information on the findings and conclusions of inspections

Table 1

Registration of audit firms and individual auditors as at 31 December 2016

Profile of audit firms	No. of audit firms	No. of individual auditors	No. of PIEs	% of market capitalisation	No. of schedule funds	% of total net asset value
Partnerships with 10 and more partners	7	185	842	94.30	992	99.24
Partnerships with 5–9 partners	12	58	190	2.03	9	0.04
Partnerships with 2–4 partners	32	82	110	3.58	20	0.72
TOTAL	51	325	1,142	99.91	1,021	100.00

Source: AOB

Figure 14

Licensed individuals and audit firms as at 31 December 2016⁴⁶

Type of licence	Auditor	Audit expert	Total per 31.12.2016	Total per 31.12.2015
Individuals	2,539	6,653	9,192	8,927
Sole proprietorships	250	272	522	560
Audit firms	798	1,595	2,393	2,420
State-regulated audit firms ⁴⁷	–	32	32	33
Total licences	3,587	8,552	12,139	11,940

Source: FAOA

“At Dec 31, 2016 281 firms were registered with the CPAB. 18 new firms registered and 22 firms voluntarily deregistered”

CPAB Annual Report 2016

Good Practices: Approvals and Registrations

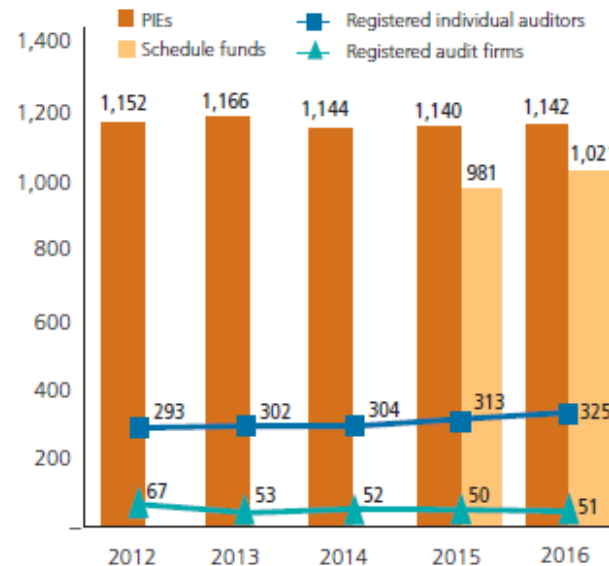
Total number of individuals and firms

In 2016, the Board considered and approved registration applications of 63 accounting firms, including 25 non-U.S. firms. The Board disapproved one registration application, revoked the registration of 18 firms and suspended the registration of two firms. During the year, 139 firms withdrew from registration.

At the end of 2016, there were 2,013 firms registered with the PCAOB, including 1,113 domestic firms and 900 non-U.S. firms located in 89 jurisdictions.

Source: PCAOB

Chart 1
5-year registration statistics of registered audit firms and individual auditors



Source: AOB

Figure 20
Number of licence renewals granted in 2016

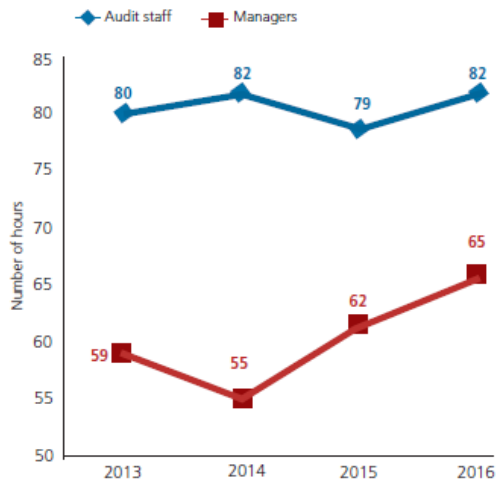
Licence type	Auditor	Audit expert	Total 2016	Total 2015
Sole proprietorships	11	13	24	75
Audit firms	49	64	113	458
State-regulated audit firms	-	3	3	8
Total licence renewals	60	80	140	541

Source: FAOA

Good Practices: Approvals and Registrations

Trends in Licensing

Chart 4
Average number of training hours incurred



Source: AOB Analysis – Top 10 Audit Firms in Malaysia

Chart 5
Audit practice staff by level to total headcount

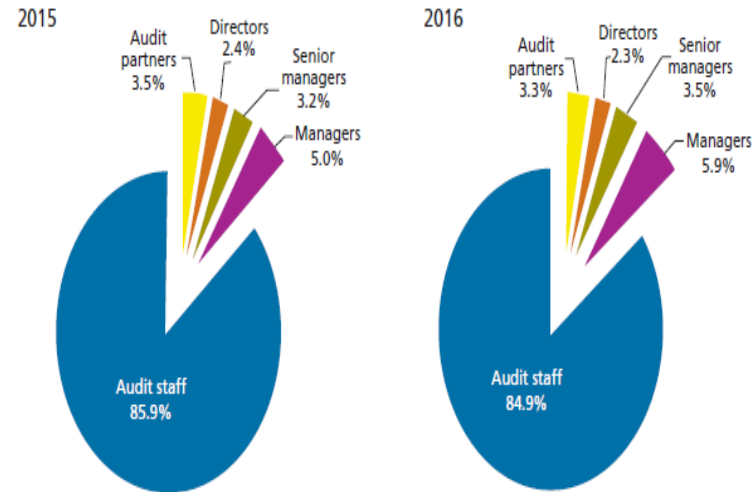
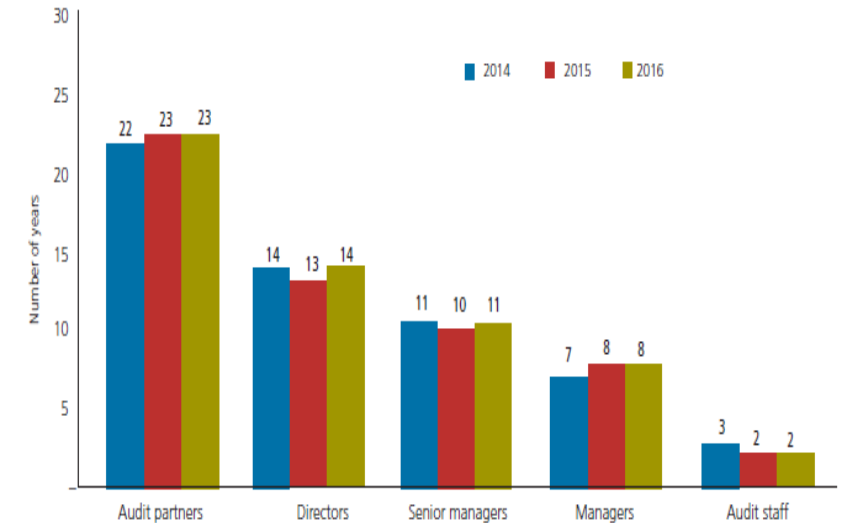


Chart 6
Average years of experience for audit practice staff



Source: AOB Analysis – Top 10 Audit Firms in Malaysia

Illustrative Good Practice

Insights into top ten audit firms

Adoption of Standards

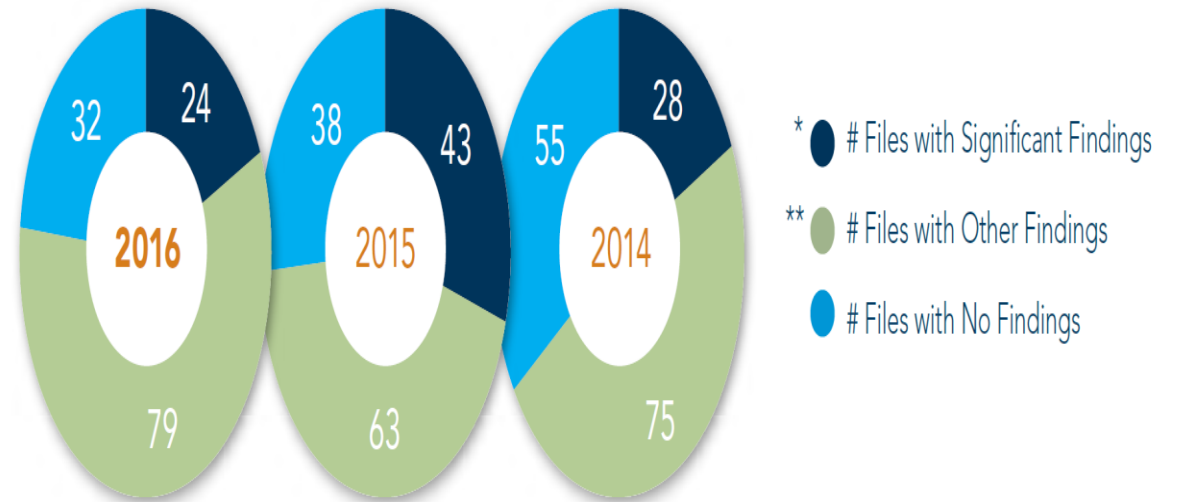
Institution	Element 1	Element 2	Element 3
FAOA	Commentary on standards adopted and differences between SAS and ISA	None	Comment letters issued
PCAOB	Commentary of the standard setting process	Approved Amendments and Rules	Proposed Standards, Amendments and Rules
AOB Malaysia	None	New standards adopted	Details of AOB's activities to promote high quality financial reporting practices
FRC, UK	Commentary on standards adopted	Implementation of new standards	Interaction with the IAASB, inputs into the standard setting process



Figure 1
Overview of FAOA inspections and Comment Form findings 2008–2016

Categories	Largest five audit firms		Other		Total	
	01.04.2008 – 31.12.2016	Of which 2016	01.04.2008 – 31.12.2016	Of which 2016	01.04.2008 – 31.12.2016	Of which 2016
Number of inspections	39	5	51	8	90	13
Comment Form Findings Firm Review	125	1	178	5	303	6
Comment Form Findings File Review	394	38	289	19	683	57
Number of inspected files ³	122	16	51	9	173	25

Annual Firms 2014-2016 Inspections Results

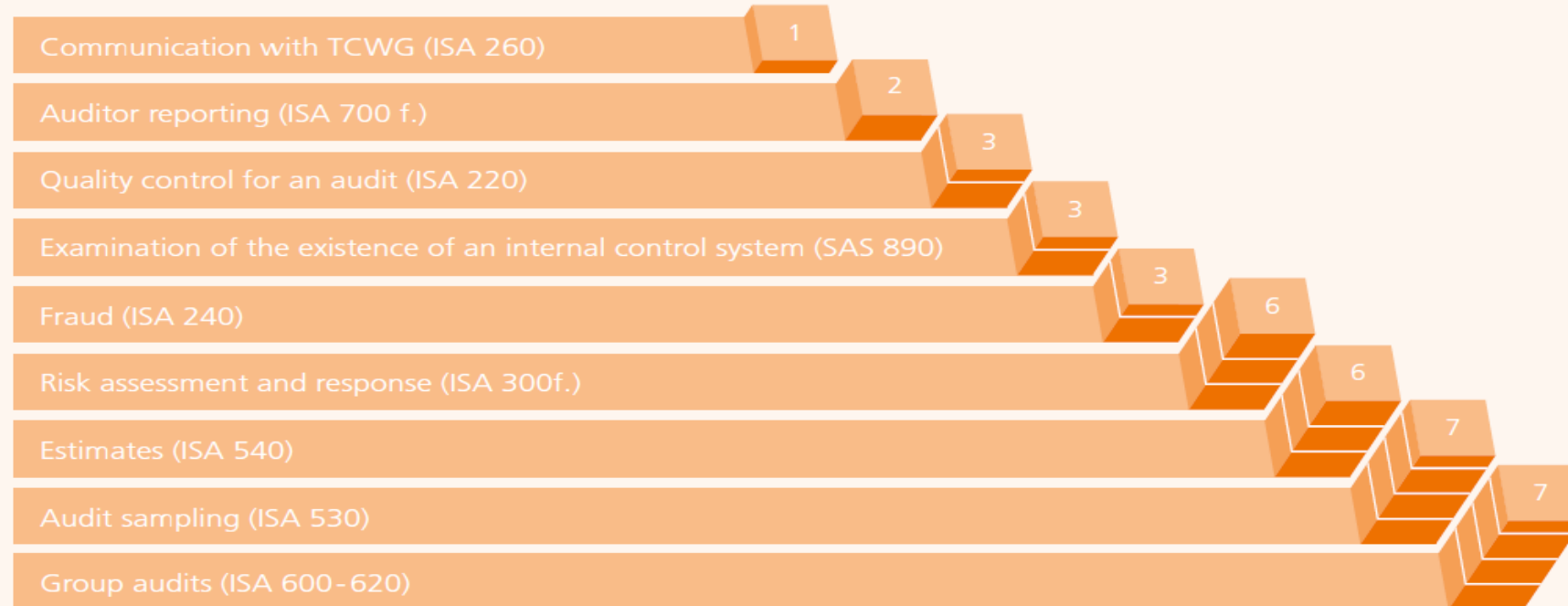


Good Practices: Inspections

Selection process, inspection cycle, number of inspections conducted

Figure 2

Type and number of findings from the 2016 file reviews at the five largest audit firms (total 38 Findings)

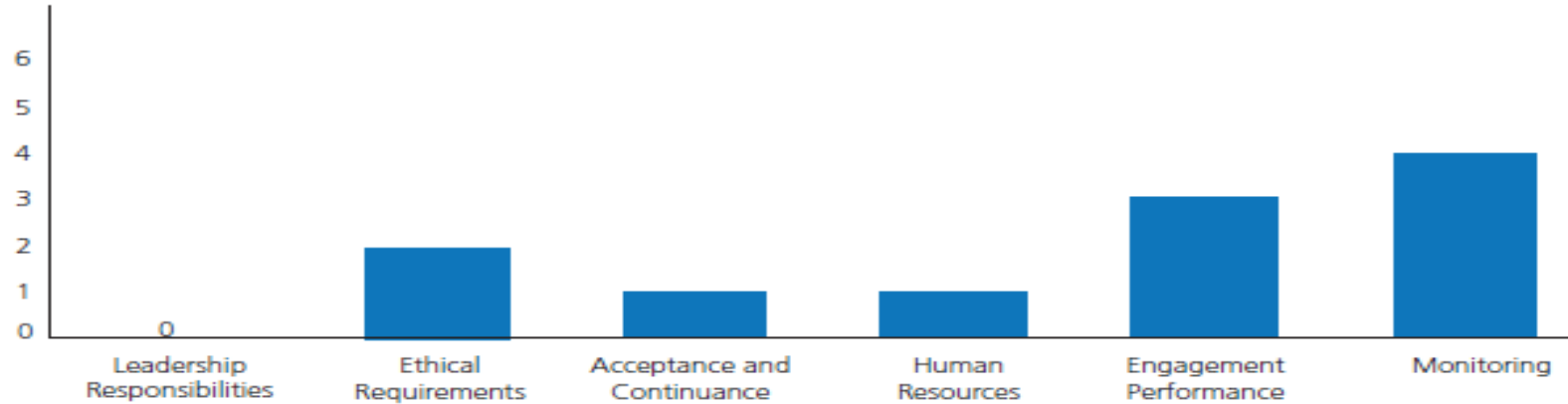


Good Practices: Inspections

Type and number of findings, key areas of inspection focus

Chart 12

Number of Major Audit Firms with findings in the six elements of ISQC 1 in 2016



Source: AOB

2016 INSPECTIONS THEMES

The majority of our 2016 findings at the 14 annual firms related to the following audit quality themes: professional judgment and skepticism, executing audit fundamentals, significant accounting estimates, understanding business processes relevant to financial reporting, and internal controls.

Good Practices: Inspections

Type and number of findings, key areas of inspection focus

Inspections: Additional Good Practices

1

**Points of focus
for current year
and next year
inspections,
similarity with
IFIAR survey**

2

**Additional
details on
Broker or
Dealer Audits**

3

**Commentary on
remediation
progress,
observations on
high risk areas**

4

**Audit
Committee
Considerations**

Enforcement actions



Number of enforcement actions, pending proceedings, legal challenges

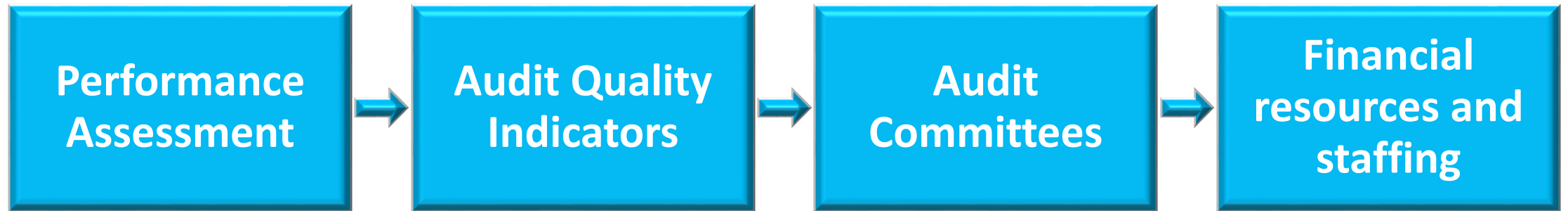
Nature of misconduct, parties involved, sanctions imposed.



Orders Related to Performance of Audits of Issuers

Date	Firm or Individual	Nature of Primary Violation	Sanctions and Notes
Jan. 12, 2016	Kim Wilfred Ti PCAOB Release No. 105-2016-004 Hong Kong	Noncooperation with a PCAOB investigation by failing to comply with a demand requiring Respondent's testimony.	Bar with the right to petition for consent to associate after three years; censure.
Feb. 18, 2016	Clay Thomas, P.C., and Clay Thomas, CPA PCAOB Release No. 105-2016-006 Nacogdoches, Texas	Noncooperation with a PCAOB investigation by failing to comply with a demand requiring the production of certain documents and information. In addition, Thomas failed to appear for testimony. Failure to obtain engagement quality reviews in connection with the audits of two issuer clients. Thomas substantially contributed to the firm's violations.	Firm: Revocation of registration; censure. Thomas: Bar; censure.

Other Good Practices



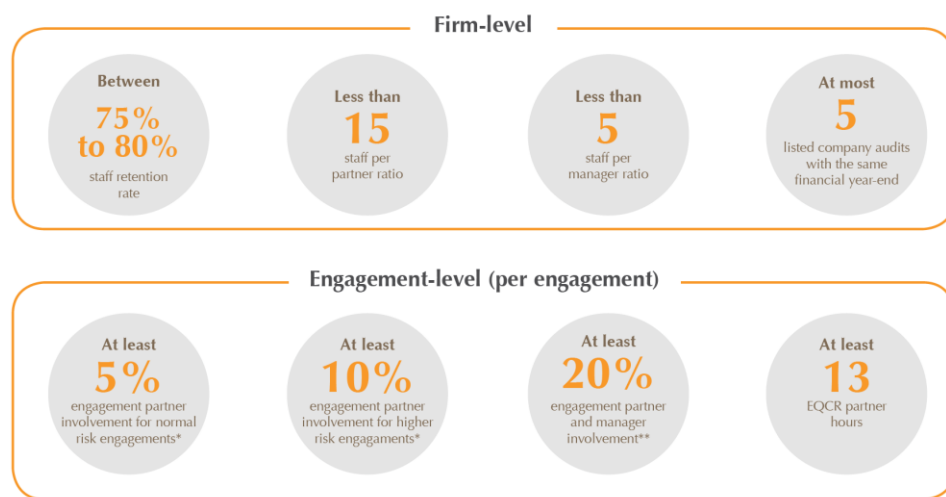
Performance Assessment for the year

Table 1

2016 PERFORMANCE REVIEW

AOB strategic outcomes	Activities	Performance assessment for 2016
Confidence in audited financial statements	<ul style="list-style-type: none"> Participated in public events to send key messages on audit quality to key stakeholders. Created awareness among key stakeholders and promoted views on the importance of audit oversight in the capital market. 	<ul style="list-style-type: none"> AOB participated in nine local and three international events.
Audit opinion based on sufficient and appropriate evidence	<ul style="list-style-type: none"> 12 audit firms and 34 individual auditors were inspected under the regular inspection conducted during the year. Monitored the subsequent impact to auditors as well as the respective PIE engagements as part of evaluating the effectiveness of AOB's regulatory activities since its establishment in 2010. 	<ul style="list-style-type: none"> The following actions taken by auditors can be directly or indirectly attributed to AOB's activities: <ul style="list-style-type: none"> Changes in audit team composition; Changes in audit procedures; and Restatement of financial statements.
Externalisation of professional values and ethics	<ul style="list-style-type: none"> Engaged with the audit firms to generate greater awareness on the need to comply with relevant ethical requirements. Encouraged audit firms to perform internal monitoring to ensure that relevant ethical requirements are complied with to safeguard independence and audit quality. The introduction of Annual Declaration submissions is in line with AOB's efforts to guide its registrants towards a more pre-emptive mindset through more regular internal reporting and monitoring within respective firms. 	<ul style="list-style-type: none"> During the year, instances of non-compliance had been identified via firms' monitoring and was reported to AOB.

Figure 10: ACRA's targets for selected AQIs



* Engagement partner hours over total engagement hours

Figure 5

Comparison of selected performance indicators relating to the audit function of the five largest stateregulated audit firms

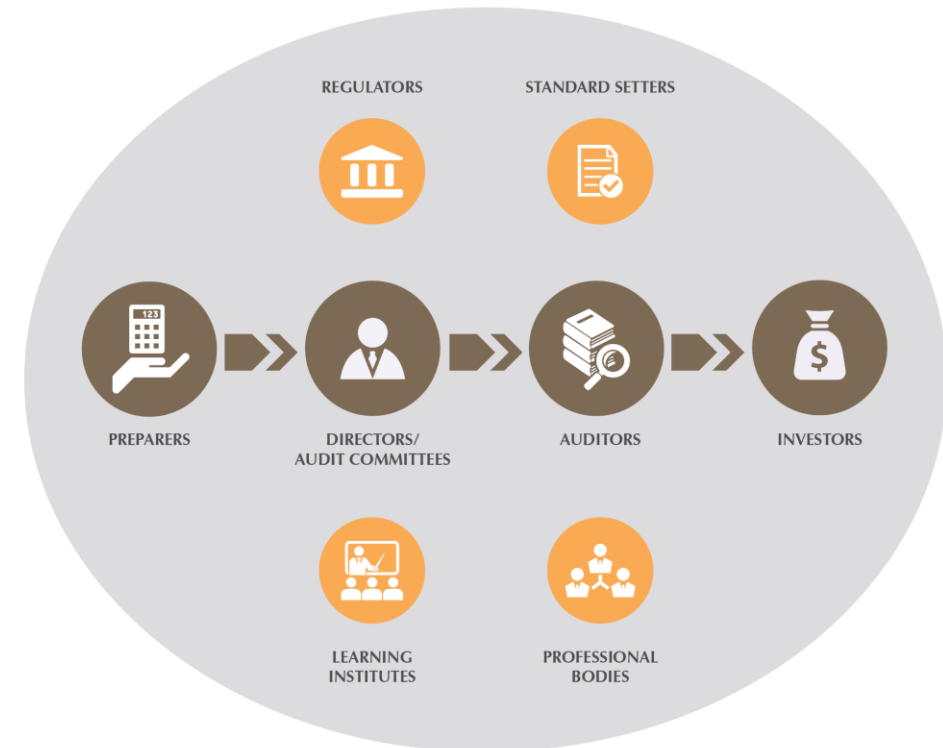
Audit quality indicator	2013		2014		2015		2016	
	from	to	from	to	from	to	from	to
Average annual revenue per audit partner in CHF mio.	1.6	4.3	1.7	4.2	1.9	4.5	1.8	4.2
Ratio of non-audit fees to audit fees								
- SMI companies	n.a	n.a	0.1	0.4	0.2	0.4	0.2	0.5
- Non-SMI public companies	n.a	n.a	0.1	0.3	0.1	0.4	0.0	0.2
Number of staff per partner	6.8	13.5	7.1	14.0	7.2	15.8	7.4	15.3
Staff turnover in %	12	26	13	26	13	25	12	27
Average number of EQCR ³⁰ hours								
- SMI companies	n.a	n.a	39	151	37	115	25	116
- Non-SMI public companies	n.a	n.a	7	18	6	17	8	17
Average number of auditor-in-charge hours								
- SMI companies	n.a	n.a	270	719	227	746	351	700
- Non-SMI public companies	n.a	n.a	69	112	71 ³¹	110	75	113
Number of foreign shared service centre hours as a % of overall hours at public companies	n.a	n.a	0	5	0	8	0	7
Number of consultations per public company audit	n.a	n.a	0	0.4	0	0.3	0.1	0.4

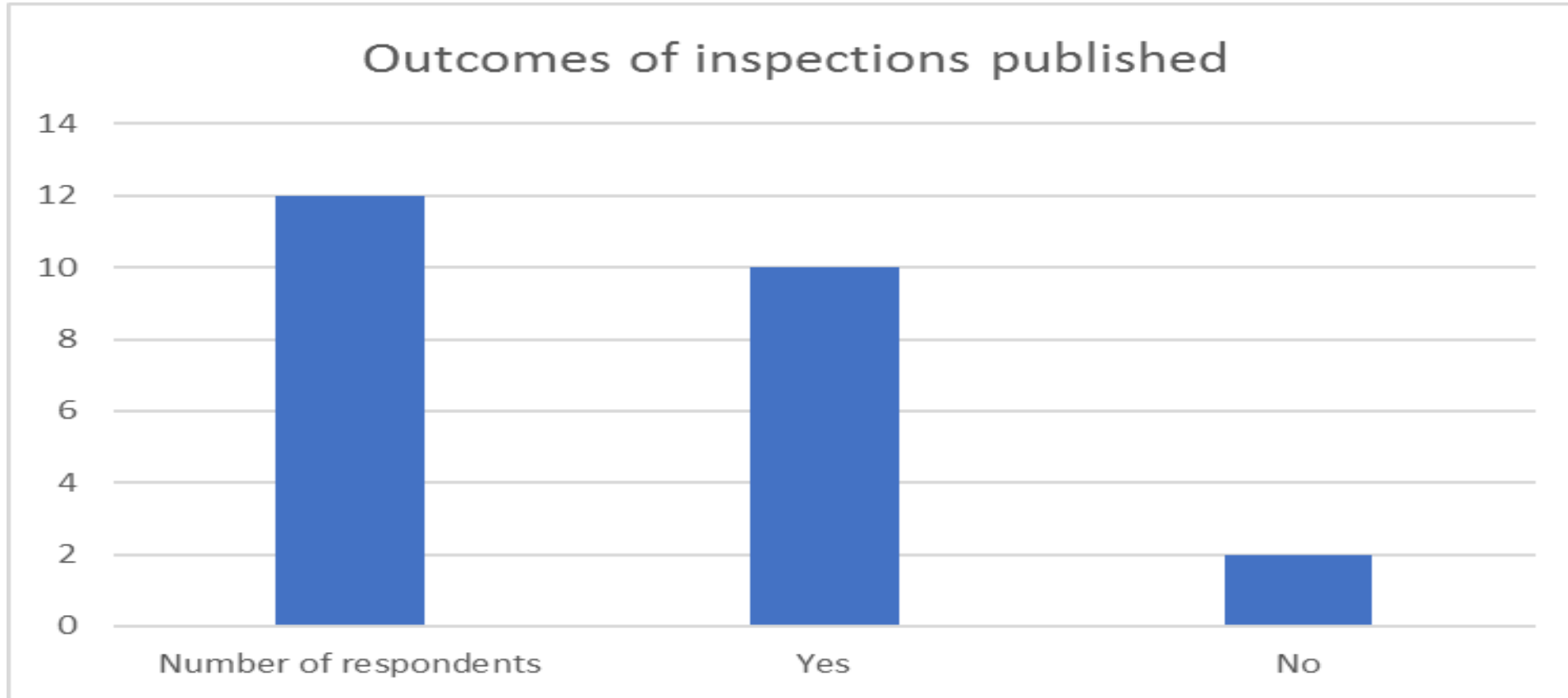
Audit Quality Indicators

Interaction with Audit Committees

- » Nature of communication
- » Introduction to the AQI framework
- » Trainings and seminars
- » Preparation of training guides

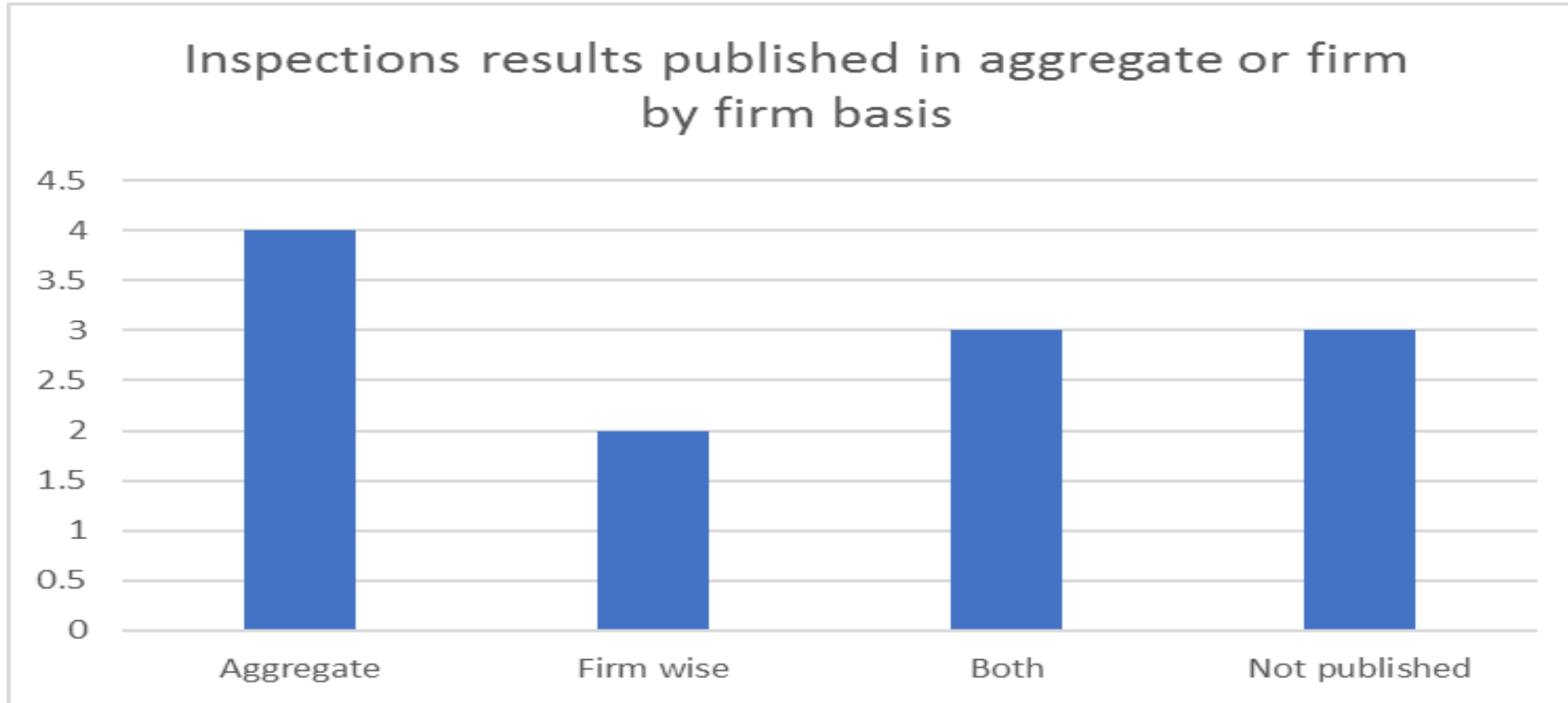
Figure 1: The financial reporting eco-system





Survey Results (Key Areas)

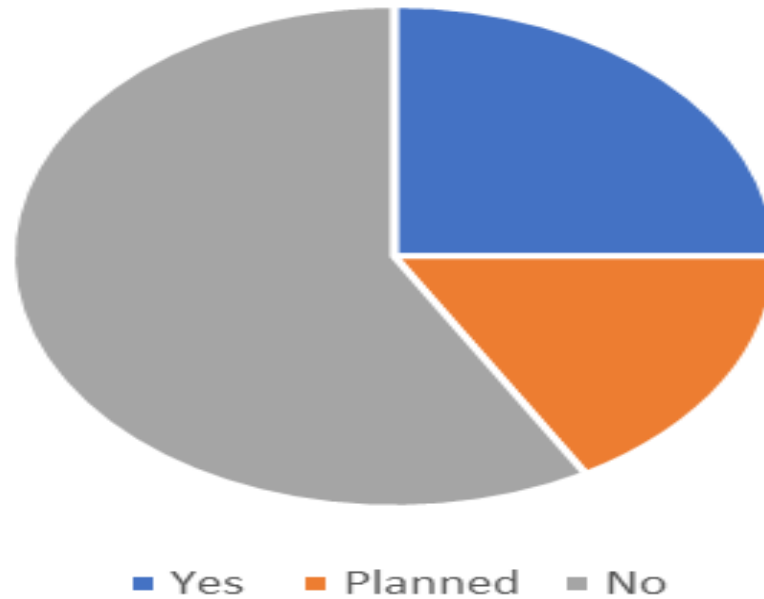
Outcomes of inspections published



Survey Results (Key Areas)

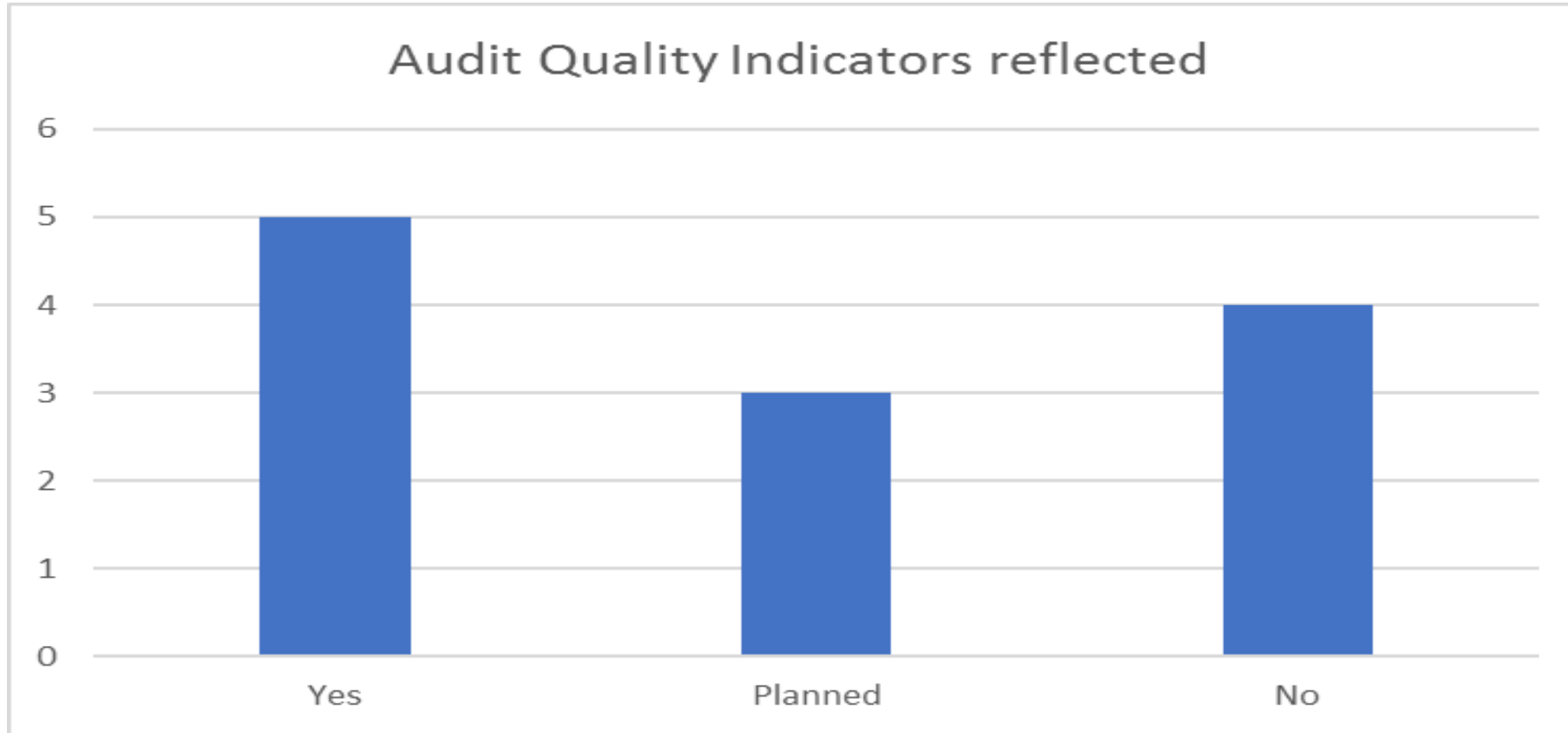
Inspection Results on a Firm or Aggregate Basis

Inspection findings segregated between large and small audit firms



Survey Results (Key Areas)

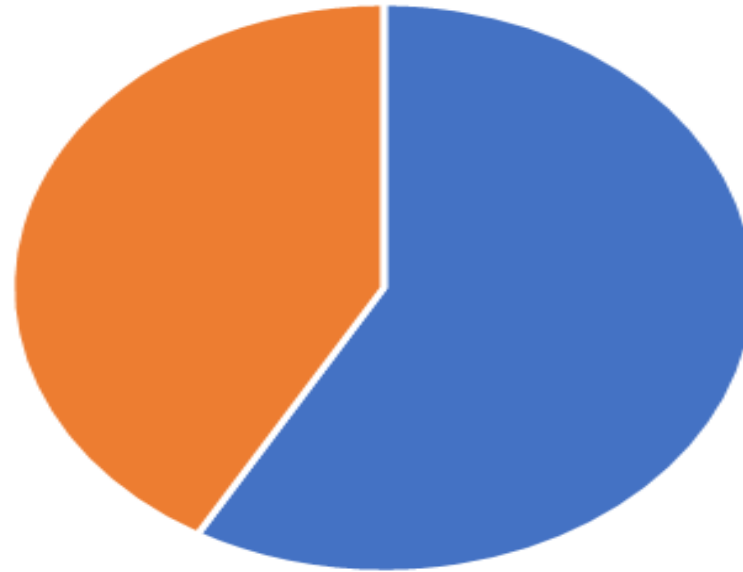
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Survey Results (Key Areas)

Audit Quality Indicators

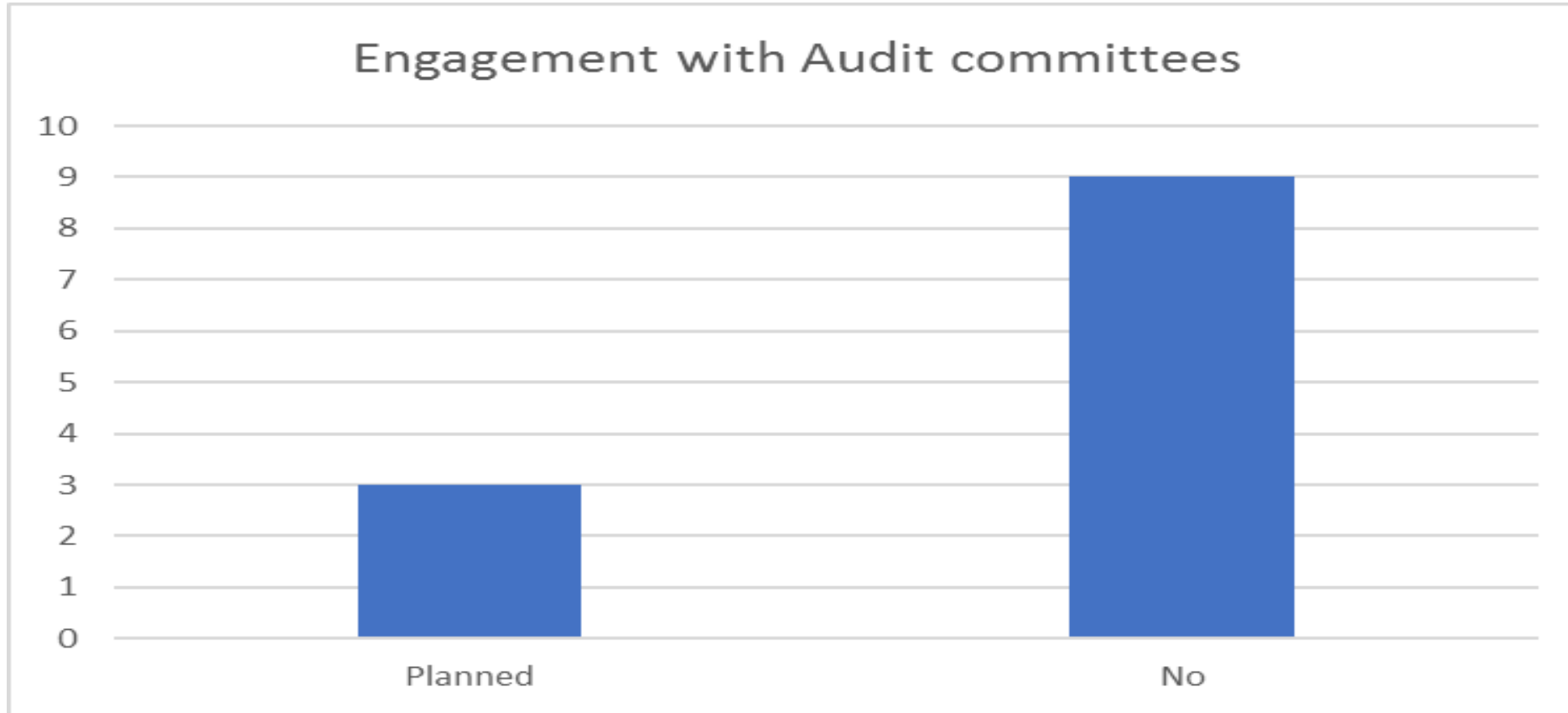
Trends in Inspection Findings



■ Yes or planned ■ No

Survey Results (Key Areas)

Trends in Inspection Findings



Survey Results (Key Areas)

Engagement with Audit Committees

