



29 March 2023

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**Re: Comment on IAASB's Proposed International Standard on Auditing 500
(Revised) Audit Evidence.**

The Auditing and Assurance Standards Committee of the Accounting and Finance Association of Australia and New Zealand (AFAANZ) is pleased to provide its comments on the International Auditing and Assurance Standards Board's (IAASB's) ED 500 'Audit Evidence' as an input into the AUASB's deliberations on this proposed standard. We will also be sending our comments to the IAASB.

AFAANZ is the peak regional academic accounting and finance association and counts among its membership the region's leading and emerging accounting and finance researchers. The Auditing and Assurance Standards Committee is an ad-hoc committee under the governance of AFAANZ's Auditing and Assurance Special Interest Group, formed to give a voice on standard setting deliberations to the academic research literature.

The views expressed in the comments that follow are those of the undersigned Committee members and do not necessarily reflect the official position of AFAANZ. While the views expressed represent a consensus view of the Committee, they do not necessarily reflect the individual views of every member.

If you have any questions on our submission, please contact either of the Committee Co-Chairs (Noel Harding – n.harding@unsw.edu.au or David Hay – d.hay@auckland.ac.nz).

Yours Sincerely*,

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**Auditing and Assurance Standards Committee of
Accounting and Finance Association of Australia and New
Zealand
(AFAANZ)**

**Comments on the International Auditing and Assurance Standards Board's
(IAASB's) Proposed International Standard on Auditing 500 (ED-500)**

We begin by commending the International Auditing and Assurance Standards Board (and the Australian Auditing and Assurance Standards Board) for their work on revising the audit evidence standard. Sufficient appropriate evidence underpins the quality of the auditor's judgment and is fundamental to audit quality and, therefore, confidence in capital markets. The research literature is replete with illustrations of the challenges that auditors face in effectively collecting and evaluating audit evidence (see Nelson and Tan 2005 for a review and Backof et al. 2018, Austin et al. 2020 and Hammersley and Ricci 2021 for recent examples). Enhancements to auditing standards that improve the evidence set available to auditors, and the evaluation of that evidence are, therefore, welcome developments. As a 'reference framework', we note the far-reaching implications for improvements in this critical and fundamental auditing standard.

Overall, we believe that the proposed standard achieves its objective of improving the generation and evaluation of audit evidence. In particular, we commend the increased focus on the process by which audit evidence is generated (as reflected in the input – output model) rather than just the output. However, on the basis of the extant research literature, we believe that there are opportunities to further improve the proposed standard. We discuss these opportunities in our response to individual questions.

In preparing our response, we limit ourselves to the broad principles presented in the proposed standard, rather than how the requirements in the proposed standard may be applied. We do not, therefore, include coverage of research outlining ways in which the requirements may be more effectively applied. These quality management issues do not fall within the remit of ED 500, but are more appropriately discussed with reference to ISQM 1 and ISA 220.

We also do not comment on the effectiveness of the proposed standard in terms of facilitating the ever-increasing use of automated tools and techniques, but do note that reference to established and emerging technologies, including AI, is largely absent from the proposed standard.

We limit our comments to the questions for which we are of the view that the extant research literature may meaningfully contribute. Specifically, we comment on Questions 1, 2, 5, 6, 9, 10 and 11.

In summary, we feel that the proposed standard;

- i. can be improved by providing additional application and other explanatory material to minimise the risk of shadow standards developing and to realise the benefits of the principles-based approach (see our response to Question 1),
- ii. should employ more appropriate work-effort verbs to prescribe requirements and recognise additional biases that may negatively impact the auditor's generation and evaluation of evidence (see our response to Question 2),

- iii. can be improved to reinforce the appropriate exercise of professional scepticism (see our response to Question 5),
- iv. needs to more explicitly address threats to audit quality from the overconfidence bias that may be evident when applying the input – output model (see our response to Question 6),
- v. should emphasise that the attention given to accuracy and completeness is not meant to diminish the importance of the other attributes of relevance and reliability (see our response to Question 9),
- vi. should emphasise and provide a more complete coverage of the biases that may threaten the effectiveness of the stand back requirements (see our response to Question 10), and
- vii. should emphasise and provide a more complete coverage of the biases that may threaten the generation and evaluation of evidence originating from information prepared by a management’s expert.

We expand on these points below.

1. Is the purpose and scope of ED-500 clear? In this regard:
 - (a) Does ED-500 provide an appropriate principles-based reference framework for auditors when making judgments about audit evidence throughout the audit?
 - (b) Are the relationships to, or linkages with, other ISAs clear and appropriate?

We support the principles-based reference framework but caution that a principles-based approach may lead to shadow standards that may be more restrictive than that originally intended. Application material may need to be revised to help ensure the benefits of the principles-based approach are realised.

We support the principles-based framework in that research highlights that a principles rather than rules-based approach is likely to have a more positive impact on audit quality as the type and amount of work that the auditor does is tailored to the unique circumstances of each engagement (e.g., Willekens and Simunic 2007; Sin et al. 2015). The effectiveness of a principles-based approach, however, rests on the ethics and competence of those applying the standards (Knechel et al. 2013). Encouragingly, we acknowledge the strength of the extant ethics codes and quality management standards underlying the current suite of international standards on auditing.

We do, however, caution that principles-based standards can lead to differences in professional judgments (e.g., Peecher et al. 2013) and encourage auditors into a defensive mindset to minimise the risk of being second guessed by audit quality inspectors (e.g., Kang et al. 2015; Peecher et al. 2013). In addition, the potential for ex-post interpretation of the standards being different from ex-ante interpretation is increased when considering principles-based standards, and this may lead to ‘shadow’ standards that are less principles-based and more stringent than the ‘official’ standard (Knechel 2016). Similarly, Boland et al. (2020) discuss unofficial standard setting by inspection. To the extent that this is the case, the benefits of the principles-based reference framework might not be fully realised. This is particularly the case in the proposed standard where the auditor’s required work effort is determined by what is judged to be ‘applicable in the circumstances’ (see paragraph 9). Ye and Simunic (2013)

highlight the importance of balancing precision in auditing standards so as to encourage an optimal level of work effort.

Notwithstanding the IAASB's stated aversion to creating an unnecessary burden on auditors in evaluating the relevance and reliability of information, and emphasis that the attributes of relevance and reliability are not intended to be used as a checklist, we fear that this may be the way paragraph 9 is interpreted.

To address this concern, the IAASB may need to redraft the application and explanatory material that relates to the exercise of the auditor's judgment as to whether, and the degree to which, attributes of relevance and reliability are applicable. We believe that the existing material in paragraphs A53 – A62 is too focused on 'the extent to which' attributes may be applicable rather than 'whether' they are applicable.

2. What are your views about whether the proposed revisions in ED-500, when considered collectively as explained in paragraph 10 above, will lead to enhanced auditor judgments when obtaining and evaluating audit evidence?

While we are of the view that the proposed revisions in ED-500 will lead to enhanced auditor judgments when obtaining and evaluating evidence, we believe that further improvements are possible in terms of the work-effort verbs employed and the breadth with which potential biases are covered.

We are of the view that the proposed revisions in ED-500 will lead to enhanced auditor judgments when obtaining and evaluating audit evidence, but believe that there are opportunities to further improve the proposed standard. In particular, we are concerned with some of the work-effort verbs employed in the standard, and the incomplete coverage of biases that can potentially negatively impact on the effective generation and evaluation of evidence.

With reference to the work-effort verbs employed to prescribe requirements, we note research that different instructional verbs can impact an auditor's judgment processes (Stepankova et al. 2022) and the spectrum of work effort implied by different verbs as outlined in the IAASB Drafting Principles and Guidelines.

We agree with the use of 'evaluate' and 'determine' in that they suggest an appropriately high level of work effort, but question the use of 'consider' in paragraphs 9, 10, 13 and 14 in that it implies a lower level of work effort than that which would appear necessary by the work being described. For example, is it appropriate for the auditor to merely 'consider' (a mid-level work effort verb analogous to 'reflect upon') the source of information and the attributes of relevance and reliability? We believe that 'evaluate' more effectively reflects the required work effort and would motivate auditor behaviour that is more commensurate with the importance of the tasks being performed.

We are also concerned by the incomplete coverage of biases that may negatively impact the auditor's generation and evaluation of evidence. Paragraph 8(a) requires auditors to design and perform audit procedures to obtain audit evidence such that evidence is neither biased toward evidence that is corroborative or contradictory. To support this requirement, paragraph A19 speaks of a number of biases, an awareness of which may mitigate threats to audit quality (i.e., confirmation bias, anchoring bias, availability bias and automation bias). We believe that this list is incomplete and encourage the IAASB to expand the coverage of biases in the proposed standard.

The auditing literature is replete with research highlighting the impact of biases on auditor judgments (see Knapp and Knapp 2012 for a concise summary of cognitive biases impacting audit engagements). Some important biases not currently discussed in the proposed standard

include overconfidence bias, hindsight bias, averaging bias, and representativeness bias. In particular, we believe that overconfidence bias is likely to have a significant impact on the evaluation of evidence (e.g., Pincus 1991). Similarly, we note research highlighting the impact of an averaging bias when auditors evaluate a combination of contradictory and confirmatory evidence items (Lambert and Peytcheva 2020).

We are also concerned that the current coverage of automation bias in paragraphs A22 and A23, which focusses on the overreliance of information from automated systems, does not acknowledge the possibility of algorithm aversion/apprehension which leads to an under-reliance on information from automated systems (e.g., Commerford et al. 2022). We encourage the IAASB to provide a more balanced coverage of automation biases in the application and other explanatory material.

5. Do the requirements and application material in ED-500 appropriately reinforce the exercise of professional scepticism in obtaining and evaluating audit evidence?

We believe that there are opportunities for improvements in the proposed standard that will further reinforce the appropriate application of professional scepticism.

We believe that there is a further opportunity for the IAASB to reinforce (and clarify) the exercise of professional scepticism in obtaining and evaluating audit evidence.

Professional scepticism, by definition (and application) is focused on the evaluation of evidence and is directly relevant to the requirements in Paragraph 13 and 14 of the proposed standard (and the application material in paragraphs A84 to A88). With the revised focus on both the information to be used as evidence and application of procedures on that information in order to convert information to evidence, the auditor's scepticism is directed not only toward the evaluation of evidence, but also the process by which that evidence is generated. We believe that this is a positive development, but is an improvement that will be easily lost on those applying the revised standard.

Audit research distinguishes between sceptical judgments, sceptical intentions and sceptical actions (e.g., Nelson 2009; Nolder and Kadous 2018) and a common finding in the research literature is that while auditors may make more sceptical judgments (e.g., questioning the reliability of information intended to be used as audit evidence), they do not express intentions and propose actions that will address the expressed level of scepticism (see Hurtt et al. 2013 for a review). We believe that focusing auditors on the process by which audit evidence is generated reinforces the exercise of professional scepticism in obtaining and evaluating evidence. In this regard, Bell et al. (2005) argue for the merit in focusing auditor's attention inward toward their own fallible judgments and Grenier (2017) and Harding and Trotman (2017) both demonstrate the merit in focusing the auditor's attention on process.

We do not, however, believe that the proposed standard realises its potential in terms of fostering the appropriate exercise of professional scepticism and we believe that there is an opportunity for the IAASB to elaborate on the application material applicable to paragraphs 8 and 9 to reinforce the need for the auditor to focus their questioning mind on the process by which the audit evidence is generated and not just the evaluation of that evidence.

We further note the reinforcement of the neutral professional scepticism perspective in the proposed standard, with the emphasis on not performing procedures that will bias the evidence obtained towards being either corroborative or contradictory. We are concerned, that the proposed standard, especially as a reference framework, may constrain the exercise of professional scepticism where asymmetric doubt is appropriate. One such area is the auditor's consideration of fraud. In such a situation, a presumptive doubt scepticism perspective is likely

to be more effective (Quadackers et al. 2014). We therefore believe that paragraph 8(a), as presently drafted, constrains the effective application of professional scepticism when the circumstances call for ex-ante bias. It also creates a conflict between paragraphs 8(c) and 8(b) in that ‘appropriate in the circumstances’ may involve procedures deliberately aimed at generating evidence that is biased toward corroborative or contradictory evidence. We believe that paragraph 8(a) should be rephrased to require that audit procedures be performed in a manner “...that is not *inappropriately* biased towards obtaining ...” and application material expanded to highlight the circumstances where the auditor may perform audit procedures that assume some asymmetric doubt.

6. Do you support the revised definition of audit evidence? In particular, do you agree with the “input-output model” that information can become audit evidence only after audit procedures are applied to it?

We support the revised definition of audit evidence and the input-output model, but believe that improvements in the application material are necessary to highlight and minimise threats to audit quality from overconfidence bias.

As noted in our response to Question 5, research findings support the increased focus on process implied in the input – output model (Bell et al. 2005; Grenier 2016; Harding and Trotman 2017). While we support the revised definition of audit evidence, we also caution that unintended biases may need to be addressed in the application and other explanatory material.

The revised definition of audit evidence requires the auditor to be more actively involved in the creation of audit evidence in that they must perform procedures on the information in order for evidence to be generated. This increased involvement in the generation of audit evidence, may give rise to biased interpretation of that evidence.

Research (e.g., Smith et al. 2016; Kachelmeier and Rimkus 2022) highlights that auditors who chose to acquire information rather than have it supplied to them weigh that evidence more heavily and are more confident in their judgments. The increased and explicit involvement in transforming information into evidence, therefore, may lead to a biased interpretation of that evidence.

As we note in our response to Question 2, we are concerned that overconfidence bias has not been acknowledged in paragraph A19 and we again encourage the IAASB to consider including overconfidence bias in the discussion on biases. This would facilitate a reference back to overconfidence bias in the application and other explanatory material relating to paragraph 13 (i.e., Evaluating the Audit Evidence Obtained).

9. Do you agree with the separate conditional requirement to obtain audit evidence about the accuracy and completeness of information when those attributes are applicable in the circumstances?

We do not object to the emphasis on accuracy and completeness, but believe that the application material should emphasise that this is not meant to diminish the importance of other attributes.

We do not object to the separate conditional requirement in paragraph 10 as it relates to accuracy and completeness, but are concerned that the increased salience associated with these attributes may reduce the perceived importance of the other attributes. In addition, we note

research (Joe et al. 2017) highlighting that auditors may be overly focused on and persuaded by quantified evidence which is often associated with accuracy, meaning the singling out of accuracy, among other attributes, may lead auditors to over-weigh the attribute of accuracy at the expense of other attributes.

To the extent that the IAASB wishes to emphasise the attributes of accuracy and completeness, we encourage the IAASB to also emphasise in application material (i.e., paragraphs A63 – A65) that the additional work effort required when the attributes of accuracy and completeness are applicable is not to diminish the importance and significance of other attributes in evaluating relevance and reliability.

10. Do you agree with the new “stand back” requirement for the auditor to evaluate audit evidence obtained from the audit procedures performed as a basis for concluding in accordance with ISA 330 that sufficient appropriate audit evidence has been obtained?

We agree with the stand back requirement but believe that its effectiveness needs to be reinforced with a more complete coverage of the biases that may impact judgments associated with the stand back.

We agree with the stand back requirements expressed in paragraph 13 in that research (Zimbelman 2022) highlights the merit in auditors making a second judgment (i.e., drawing on the crowd within – Vul and Pashler 2008). In making a second judgment, individuals apply their knowledge differently, thereby reducing noise and potential bias (Herzog and Hertwig 2009). We note, however, the potential for bias to be introduced when auditors return to their original judgment. Anchoring bias, where auditors over-weigh their initial judgment (Tversky and Kahneman 1974) when ‘standing back’ and reflecting on that judgment may be particularly troublesome in this setting. Similarly, we note in response to Question 6 that an information choice effect (e.g., Smith et al. 2016) may lead auditors to be overconfident in the evidence that they have generated which, in turn, may limit the effectiveness of the stand back requirements.

We therefore encourage the IAASB to explicitly make reference back to the discussion of biases in paragraph A19 – A23 when revising the application material relating to the stand back requirements in paragraph 13, and to present a more complete coverage of biases that may threaten the quality of audit evidence. See also our response to Question 2.

11. Are there any other matters you would like to raise regarding ED-500? If so, please clearly indicate the requirement(s) or application material, or the theme or topic, to which your comment(s) relate.

To the extent that the IAASB wishes emphasise information prepared by a management’s expert, we believe that the biases that may impact judgments made on the basis of information prepared by a management’s expert should be highlighted.

We note the incremental requirements expressed in paragraph 11 when information intended to be used as audit evidence has been prepared by a management’s expert. Recognising the IAASB’s intent with regard to the incremental requirements, we feel that there is an opportunity to strengthen the requirements and application material as they relate to the unique circumstances of using a management’s expert.

Research (Agrawal et al. 2020) suggests that auditors may overly rely on the perceived reputation of the expert’s firm when evaluating the expert. That is, the evaluation may be subject

to an availability bias. Agrawal et al. (2020) also note that auditors may over-rely on the expert's work on account of the perceived superior knowledge of the expert (i.e., exhibit overconfidence). Similarly, Agrawal et al (2021) highlight that conversations with the management's expert (conversations necessary to obtain the understanding required in paragraphs 11(b) and 11(c) may bias the auditor's evaluation of relevance and reliability such that they may be less challenging of the management expert's work. See also Hux (2017) for a review of research on auditors' use of specialists (including management experts) which highlights biases that may negatively impact the evaluation and use of a management expert's work.

Given that the IAASB wishes to make special mention of the circumstances around information prepared by a management expert, and not rely on the principles contained in paragraph 9, we encourage the IAASB, in the application material accompanying paragraph 11, to explicitly refer the auditor back to the discussion on biases in paragraph A19 and to provide a more complete discussion on the biases that may impact judgments relating to the generation and evaluation of evidence. See also our response to Question 2.

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