INTOSAI

Performance Audit
Subcommittee

Performance Audit Subcommittee

Feedback on

Component 1 review (August 2020 update):

"Analysis of the framework and next steps"

The following are comments and suggestions from the Performance Audit Subcommittee[1] to the Component 1 review, August 2020 update by PSC.

No.	Subject matter	PAS general comments and recommendations
		General comments
1	**Main PAS conclusions**	It is commendable that the first steps towards fulfilment of the SDP for the IFPP 2020-2022 has proceeded in these difficult times, and the Performance Audit Subcommittee (PAS) continues to support the effort to improve the INTOSAI Framework of Professional Pronouncements. A review of the audit principles in the relevant subcommittees as scheduled will be able to contribute to such an improvement. The initial analysis, including detailed comparisons of sample documents, represents a considerable effort by PSC, resulting in a number of interesting findings. Many of the remarks in the current update report from PSC regarding *format* are particularly well pointed out, and we will return to those issues in some more detail throughout. In addition to focusing on improved clarity of the framework, the PSC also introduces discussions such as regarding the nature of IFPP documents, as well as audit type nature. We will also comment on these issues. Although PAS analysed findings in some detail, the Chair made the conscious decisions not to go into excessive detail in this feedback process. Instead, we focus much of our attention on the way forward. The position of the PAS remains that when it comes to format and drafting across the IFPP, there is significant room for improvement through a "Clarity Project", which could also include a discussion about the nature of documents. When drawing up the detailed plans for this process, all relevant parties must get involved at this point. A clarity project will require that the three dedicated subcommittees CAS, PAS and FAAS commit significant resources. For PAS, the timing of the clarity review process coincides with the planned start-up of the 3000 series review, originally scheduled for 2021 onwards. The Component 1 review and clarity project should, however, in our view be *limited in scope*. We will elaborate on that below. The discussion about the three distinctive audit types should not be included in Component 1 and a future "Clarity Project". In the following, we will explain this view.
2	**Objective**	Component 1 clearly has merit as a "clarity project". It points to the basic reasoning for establishing the IFPP, which was, among other things, to slim down the volume of the ISSAI framework, eliminate unnecessary duplication, strengthen consistency in wording and use of concept, and to clarify the relationship between principles and standards. PAS remains adamant that a "clarity project" is necessary to secure the quality of the IFPP for the future, and to maintain the credibility of INTOSAI as a professional standard setter. Such clarity projects are also known from other standard setters, such as the IAASB: https://www.iaasb.org/publications/iaasb-clarity-project-update Against that background, we believe the *scope* of Component 1 should be rather narrow, focusing on IFPP clarity **only**, without bringing into play fundamental matters such as the division between audit types. Details concerning the way forward of the "clarity project" should be up for discussion with all relevant parties involved.

[1] Following a call for comments dated 8 September 2020, with the deadline 23 September 2020, the following PAS members reviewed and gave feedback to the Component 1 review August 2020 update: SAIs Austria, Brazil, the Netherlands, France, Canada, Denmark, India, Hungary, Romania, and PAS Chair. We also received input from observer IIA.

3	**Drafting**	At the time the documents were drafted, decisions made regarding the content of the documents (principles, standards and guidelines) were based on negotiations, compromises, and professional judgement, not abstract definitions of principles, requirements and application explanations. This is an important backdrop as we enter into these discussions.
4	**General reflections on the three types of audit**	We define audit types by different objectives, but also by different methods and scientific disciplines. We cannot enter into this discussion with limited empirical evidence, lack of support in the literature, and limited experience in dealing with the three different types of engagement. Financial and performance audit have fundamentally different approaches and methods, while compliance audit is somewhere in between. Competencies for performance audit (PA) and financial audit (FA) are very different, and a well-trained performance auditor is usually unable to conduct a FA without close supervision, and vice versa. In some SAIs even, the professional career is different, where FA professionals are called auditors while PA professionals are called analysts. In Courts of Accounts in countries of a Roman tradition in law (opposed to common law), CA auditors need to have a background in law. The complexity of performance audit requires - ideally - a background in research methodology for the social sciences. We will return to the discussion about the distinct audit types in the following.
5	**Repetition**	As long as we maintain the idea that we can refer to level 4, it has to be readable on a standalone basis. One therefore cannot avoid repetition between ISSAIs 300 and 3000. That is not necessarily a sign of weak drafting, but a feature of the system. We will get back to repetition in more detail below, as repetition and inconsistencies refer to many different circumstances, and not only wording. Related to this discussion is of course another discussion: should INTOSAI maintain the different levels?
6	**Inconsistencies**	Some assumptions behind the findings appear somewhat naïve in terms of understanding the different ways to formulate rules. It is not decisive whether the word is "shall" or "should". Rules can be conditional (if x, then y), goal oriented (try to achieve x), principle based (in doing x, you should consider y) and much more. Different situations and objectives require differently structured rules. On the other hand, as the review clearly points out, there are inconsistencies in wording between documents that cover the same audit type. The review also identified inconsistencies in level of detail. The PAS fully agrees that there is room for improvement in drafting, both generally speaking, and specifically for the documents covering PA.
7	**Levels**	In principle, PAS welcomes a discussion about the relationship between the levels as part of Component 1. If the structure is kept, there is obviously room for improved consistency and clarity, and decisions have to be made as to whether the thousands series should be readable as standalone documents. If INTOSAI decides to maintain the current structure, ISSAIs 300 and 3000 should no doubt be better aligned. That was also the intention with regard to PAS´ planned maintenance of the performance audit documents, scheduled for start-up in 2021. Levels referring to each other does not *necessarily* pose a problem. From a legal point of view that seems obvious: You try to interpret the law consistent with the constitution and you try to understand the constitution with a view to the law. The real issue may be the lack of updated and accurate references between levels and documents, as the review correctly points out. In addition, PAS welcomes a general discussion about the usefulness of current levels and structure of the IFPP. The subcommittees responsible for the professional content covering PA, CA and FA need to get involved in discussions about the technical planning of the clarity review at this point.
8	**Initial analysis - ISSAI 100 versus ISSAI 300**	The review naturally does not explain *why* the differences between 100 and 300 exist, and it is important that PAS and the other two specialised subcommittees clarify what is required for each audit type. Some or perhaps most of the perceived "inconsistencies" represent real differences between the audit types. Their removal and any attempt to phrase most requirements the same way as in ISSAI 100 could be detrimental to performance audit unless the nature and complexity of performance audit is part of the considerations leading up to such significant changes. The discussion consists of two possible outcomes: should we keep the current structure (100, 200, 300 and 400), or should we have one document only (a generic and improved ISSAI 100)? In addition, the review discusses the relationship between the levels. All these elements are valid in a project to improve the IFPP, and requires broad participation. The responsibility of the PAS is to make sure documents give an accurate account of performance audit methodology that reflects SAI best practices. A discussion about linguistic consistency needs to consider the complexity of especially performance audit methodology and application.

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9	**Q1**	**Question 1: Principles-based standards are ones which set out what should be achieved, but not how they should be achieved. To what extent do you think that the IFPP in its current form achieves this aim?** A clarity project should first set out to explain the meaning of "principle based" and, secondly, assess what is feasible when it comes to communicating and presenting the distinctive audit types in the IFPP. Generally, a step towards more principle-based standards might be possible, but due to the nature of performance audit, the PAS is initially reluctant to accept a format that refers to a "minimal" approach. We would warn against application of technical linguistic logic without considering why the texts are phrased the way that they are. Credibility not only rests in consistent documents but also in consensus and their actual application. While a clear and consistent logic is desirable in theory, it might actually increase problems concerning implementation and actual practice in the SAIs, unless we are mindful of the difference between the three types of audit when assessing a new structure and style. In this context, it is necessary to be aware that the political and economic systems of member states vary significantly and the "pretext" that the basic values of good governance as they translate to auditing are the same everywhere will work only to a certain degree. Documents must therefore be flexible enough to remain inclusive. PAS believes that the review process did not sufficiently consider those factors while comparing the documents (e.g. ISSAIs 100, 300, 3000). As we move forward with component 1, there needs to be a clearer understanding of the difference between issues that are simply a matter of wording/terminology, and issues that represent fundamental differences in application and context. The hundreds-series is a declaration that puts under the same framework the three audit types, with their distinct origins, mind-sets and methodologies. For this reason, the hundreds series comprises details that are not expected to be in principle-based documents. In the previous framework, updates had already been scheduled, with documents that were higher in the structure to be reviewed in a longer timeframe. Seven years after endorsement, it is now time to schedule the review of the audit principles. The expression "principle-based" standards should not be taken literally, or applied too strictly, when referring to the audit standards (thousands-series) because they are meant to be used as a framework for the field work, which requires a greater level of detail than expected from a principle-based document.
10	**Q2**	**Question 2: The IFPP currently contains principles in the form of INTOSAI-Ps (covering most organisational issues), as distinct from ISSAI principles covering audit issues. Do you think this distinction should be maintained, or would the framework improve in clarity if it contained a single set of consistently conceived and presented principles?** This is perhaps more a matter of taste than a principal matter, although the present division might be a bit strange. Principles that cover audit issues are now called 'standards' while the other principles are called 'principles'. Nevertheless, the idea behind the division is clear, and the different naming (INTOSAI-P and ISSAI) makes all the difference. Now, it is not a problem if the current division is kept, but the issue may very well be part of a discussion within the frames of the clarity project.
11	**Q3**	**Question 3: The framework currently presents in ISSAIs 100, 200, 300 and 400 those requirements to be taken into account by those who wish to prepare their own standards or follow those prepared by others, and additional detailed requirements in 2000, 3000 and 4000 for those who wish to implement the standards directly. The requirements set out in these two levels of documents are, of course, interlinked (and the issues connected with this approach set out in the interim report). Is this distinction necessary, or could the material be merged and an indication given of the minimum?** This is a very complicated question, which requires careful consideration. First, it is necessary to consider limitations in the current documents in light of their reason of existence. It is likely that relevant standard-setting bodies (subcommittees, PSC and FIPP) analyse documents with different ambitions (consistency with actual practice vs. ambitious aims, practicality vs. desirability, etc.). Generally, we would advise against changes that follow *logic* only, without considering other crucial factors. The logic of elaborating a distinct set of principle documents and detailed standards with requirements is well-described in question 3. Since the time of endorsement, those documents serve a variety of purposes depending of the national context. In performance audit, it is very helpful, and perhaps *necessary*, to have standards that include requirements, as opposed to standards that are purely principle-based. Some SAIs do not have a clear set of requirements at hand, and even if they do not adopt the

		thousands series directly, it may provide a basis for writing or adapting context-specific, national standards. The thousands series is at the same time directional when it comes to ensuring legitimacy, especially because of its emphasis on quality objectives.
		The PAS believes that the topic introduced in question 3 is relevant for the Component 1 process, but any decision should be based on empirical evidence that there is in fact a need to make fundamental changes. The PAS had already planned to make a comparison between ISSAIs 300 and 3000 for the sake of assessing clarity, consistency, and the usefulness of the two levels combined. As a minimum, we believe there is significant room for improvement *between* the two levels. Whether or not the material could be merged and an indication given of the minimum remains an open question at this point. In light of keeping the framework simple and focus on the essential (as indicated in the SDP), merging the two levels might make the framework more user friendly and solve issues that emerged from the review (i.e. repetition, referencing, etc.). The point is, however, that the material should not be merged only for the sake of simplification. A SAI should be able to make its own adaptation of the ISSAI standards to its own national context, which introduces a number of additional considerations.
		Finally yet importantly, any transformation involving substituting ISSAIs 200, 300 and 400 for (an improved) ISSAI 100 would require significant involvement from the three subcommittees PAS, CAS and FAAS. A "minimal" ISSAI 100 may not give a sufficient and accurate account of the complexity of performance audit. For practical reasons, we need to reach a common understanding about what "minimal" means in this case.
12	Q4	**Question 4: The ISSAI framework is currently very extensive (some 260 pages), partly due to extensive amounts of repetition. Would you see benefits in clarity and application in slimming down the core framework (ISSAIs), in favour of extending guidance and good practice through GUIDs or other supporting material in a more dynamic and accessible way?** It is obvious that a simple and clear text is better than a repetitive and unclear text. However, a review process and a clarity project needs to take into consideration the difference between the three types of audit. For performance audit, a "clear, simple and minimal" text could very easily be too abstract to be helpful. There is a reason why we have several document in the current structure: they represent both the need to differentiate and the different levels of consensus. That does not mean we should not improve those documents and the framework as such, but the process will require significant resources and commitment by the expert committees. In line with previously expressed opinions about the state of the framework, PAS is not in favour of extending guidance documents (and in particular, subject matter specific guidance) and good practice documents *within* the framework. The IFPP should focus on principles and standards, including *necessary* explanatory text.
13	Q5	**Question 5: The current framework maintains a strict differentiation between currently defined audit "types" (PA, CA and FA) as if they are undertaken as distinct tasks. Does this reflect reality, or would reality be better served by recognizing these as distinct types of audit objectives, a combination of which are often addressed in individual tasks?** This question may be based on some inaccurate presumptions. The current ISSAIs 200, 300, 400 make it sufficiently clear that there are three types of audit. The theoretical distinction in the existing framework is sensible in order to clarify what the differences are between the types of audit, and in order to ensure the quality of audit activities. Combining objectives within the same audit does not mean that the distinct audit types should be amalgamated. Moreover, the current structure where PSC subcommittees elaborate the standards, allows specialists to focus in detail on the technical aspects of each type of audit. Reality is not the same in all SAIs. Some SAIs are small and do not have resources to perform separate engagements. Many SAIs make a strict distinction between FA and PA, which are conducted by professionals with different training, who have distinct responsibilities. Some SAIs conduct FA combined with CA, while others do not have a clear distinction between PA and CA. Other SAIs make a clear distinction between CA and PA e.g. because the first can lead to individual accountability (court model). Perhaps most importantly, audit types are not distinct only in objectives, but also in methods and mind-set. In many SAIs, the actions of financial, performance or compliance audit are most often conducted as distinct tasks, and their separation allows for specialized training for those performing the audit missions. The main value added of the ISSAIs is actually not their logical consistency, extensiveness, level of detail or the like. The value added is their link to what government entities actually do and why they do it. To sum up, the answer to the question is that the current differentiation reflects

		reality in both individual SAIs and INTOSAI as a whole, and should therefore be maintained. The PAS does not recommend a discussion on the nature of audit types without carefully reviewing the literature, and extensively examine audit practice and different environments. See also PAS´ comments to paras 38-39, below.
14	Q6	**Question 6: Do you believe that the content of the ISSAIs and GUIDs is easily identifiable, and is it clear what needs to be applied or used in what circumstances? Could accessibility be improved if the content was provided in a single online searchable resource, rather than individual pdf documents?** There is no doubt a need for improved clarity and logic, as well as improved accessibility, of the framework. For example by providing a single online searchable resource with actualized hyperlink. We are not sure about the intention behind the expression "searchable resource", but PAS welcomes any initiative that brings INTOSAI up to speed with new technology. With the right technical solutions, ISSAIs could be assembled in categories such as, for example, a PA "set", containing ISSAIs 300 and 3000, and GUIDs 3910 and 3920. Different searchable categories could be topical, such as "audit objectives", or based on audit type (the PA "set", CA "set", etc.). Drop down menus would be very helpful, and information should be presented in a way that makes it clear what is mandatory and what is not. PAS is generally supportive of technical developments, and believe it should be part of the clarity project.
15	Q7	**Question 7: In terms of financial audit objectives, the IFPP contains no requirements additional to those provided in the International Standards on Audit issued by IFAC, which contain increasing amounts of public sector-specific material. Should this have an impact on the way the IFPP presents its material on auditing financial statements or other financial information, and its content?** The Performance Audit Subcommittee refrains from commenting on question 7. We refer instead to the Financial Audit and Accounting Subcommittee (FAAS) as the expert committee to be consulted regarding this issue.
16	Way forward	The PAS believes that the success of this review process depends on a number of factors, such as reassessing those considerations that led to the adoption of the documents as they are today, as well as broad participation by experts in the relevant audit types who have the full overview of the framework. Without denying the need for necessary and useful changes, key elements of the existing framework should only be changed if it has been justified through an inclusive process. This also includes any debate about the distinction between levels, audit types and the idea of standalone readability of documents. The focus of the review should be on practical applicability and added value in the current setting. Our impression is that the current analysis - while being logically and formally consistent - has not yet been able to relate fully to the nature of the documents, the differences between audit types and the reasons for different wording. We therefore recommend a full review of the documents by the PSC subcommittees, possibly coordinated within a joint project team (type "Harmonisation project 2"). The result would present invaluable input for the upcoming review of the standards within the subcommittees.

Specific comments		
Para no.	**Review findings so far - PAS initial comments**	**PAS recommendations**
General	Members of the Performance Audit Subcommittee identified several interesting findings and provided valuable insight and reflections to the committee´s hearing on the Component 1 update report. Some PAS members have been in the committee since the time of drafting both the hundreds and thousands series, and serve as the "collective memory" of PAS. During the assessment of findings, having access to the corresponding tables covering the full analysis was very helpful. We want to thank PSC for the extensive work done so far, and the analysis indeed uncovered	

	some very interesting and even peculiar findings. Although the PAS finds some of the findings somewhat inaccurate, or detached from the understanding behind PA methodology, we believe it is not necessary to go into extensive detail at this early stage. In discussing the way forward, the PAS needs to get involved in order to safeguard the PA standards and guidelines, but also because the committee overall agrees that there *is* significant room for improvement.	
8	We may need to make a distinction between repetition and unnecessary duplication in *some cases*: if a document is meant to be read standalone, some repetition from other documents may be unavoidable. Of course, repetition should naturally be limited to what is strictly necessary. Specifically regarding ISSAIs 300 and 3000, the PAS has been aware of these issues for some time and will of course address them in the upcoming review. Generally, obvious illogical progression of detail and clear inconsistencies should be addressed as part of a clarity project.	A focused clarity project should address these findings.
9	The difference between principles and standards is an obvious issue for ISSAI 300 in relation to ISSAI 3000. For PAS it is also an empirical question of how many SAIs *actually* use the 300 as basis for developing their own PA standards.	
10	The PAS does not agree with the notion that there is one single audit type - with different audit objectives. Especially FA and PA are fundamental opposites regarding both purpose, objectives and approach.	PAS strongly objects to bringing the discussion about the different audit types into Component 1. See comments to paras 38 and 39, below.
11	Ref. paras 40-47 regarding multiple entries, structure, inconsistencies, missing or misleading headings, disproportional levels of detail, and unclear drafting are all good examples of lack of clarity.	These are examples of issues that should be solved as part of a clarity project.
15	1st bullet states: "the hundred-series pronouncements set out the fundamental audit principles and the essential specifics for the audit of financial statements, performance and compliance. Issues common to pursuing all audit objectives should be set out in the fundamental principles. There should be no repetition across these pronouncements when explaining the key concepts, adhering to the spirit of mutual exclusivity and collective exhaustivity". PAS comment: this would mean that a reader who is interested in performance audit principles has to read two documents: 300 and 100. One could also argue that reading 300 should stand on its own, and in that case, some repetition is necessary to understand context and meaning. We may not agree that this is very problematic, as long as the same wording is used across (where relevant). (That does not mean, however, that the wording will necessarily be the same for the three different audit types).	PAS concludes that there is definitely room for improved drafting, and any repetition must be justified. However, if ISSAI 3000 should be readable as a standalone document, without the need to consult ISSAI 300 (or 100), some level of repetition is generally unavoidable across different levels. The discussion about the hundreds level is an important part of the clarity project, and the committee recognises some of the concerns that have been identified across ISSAIs 100 and 300.
16	The review refers: "However, we found a significant number of cases of practically identical or similarly worded requirements across the pronouncements assessed". PAS comment: if pronouncements should be readable without the need to consult higher principles documents, repetition across pronouncements could even prove helpful. However, "practically identical" may be worse than "identical", because confusion arises when a certain matter is worded *almost*, but not quite the same, across two different documents.	It is necessary to improve consistency in wording through the review process/clarity project, as long as we separate wording from *content*.
17	With regard to similarities across the hundred-series ISSAIs, the review found that requirements in ISSAI 100 were drafted in a more *general manner* than those in ISSAIs 300 and 400. However, it seems logical to PAS that ISSAI 100 is more general than ISSAIs 300 and 400.	What are the assumptions behind the analysis with regard to similarities across the hundred-series? Is it that a reader should read both documents, or should ISSAI 300 stand on its own? If the latter, then some repetition is meaningful, and even useful. The examples in bullet 3 are

	Further, the review states: "at first glance, ISSAI 300 follows more the concept of mutual exclusivity *vis-à-vis* ISSAI 100 than ISSAI 400. ISSAI 300 does not elaborate on a seven and ISSAI 400 on four out of the 17 principles in ISSAI 100 (see parts A of annexes 1 and 2 respectively)". And: "However, ten principles of ISSAI 100 still have a matching requirement in ISSAI 300, and 13 such principles in ISSAI 400 (see parts A of annexes 1 and 2 respectively). This is not always justified, as many of the issues covered therein either repetitions or issues applicable to auditing either performance or compliance**".**	interesting examples, but we are not convinced that all examples represent major problems. These documents will most likely never be 100 % consistent, and some differences may even be justified. Although, overall, improved consistency and clarity of the IFPP should be our common goal, there are different views on what the framework should look like, including between the three distinct audit types.
18	PAS comment, bullet 1: One issue when writing the 3000 series was that ISSAI 300 was already given and not possible to change at the time. That is one reason for the somewhat inconsistent level of detail between 300 and 3000.	It seems obvious that the ISSAI 3000 should - consistently - provide more detail, rather than - occasionally - the other way around.
19		Generally, any repetition must be justified.
25		PAS agrees that a review should look at referencing, and clarify "what is the actual requirement" and "what is explanation of the requirement".
31		The possible problems related to "principles" should not be exaggerated. It is an issue, but you may well have principles on different levels.
38	The assumptions presented in para 38 appear to lack factual and empirical support. The para states that assumptions have been voiced that "all audit types are ultimately linked to compliance". Over the last couple of years, PAS has taken part in discussions about the construct "combined audits", and the question about whether or not guidance on such practices should be produced within the IFPP. Para 38 does not reflect what PAS sees as the real issue concerning the differences between the three audit types, and what type of challenges combining them brings about. However, that is also, in our view, less important for Component 1. We choose not to go in detail on this topic as part of our feedback, but rather advise against entering such a fundamental discussion as part of Component 1.	PAS recommends that the discussion about the three distinct audit types be kept out of the Component 1 process. PAS disagrees with the basic assumption presented in this paragraph, which is that "all audits are ultimately linked to compliance". It is an over-simplification. The question about understanding audit types is fundamental, technical, and methodological, and does not belong in a discussion about clarity of the framework.
39	We find it difficult to understand what is meant in para 39.	The issues presented in paras 38-39 should not be pursued as part of Component 1.
40-50	Paragraphs 40-50 list a number of issues that would be valuable to address in a concrete proposal for a clarity project.	
43	PAS agrees with the idea of improving headings and making necessary editorial changes in the 3000 series, and this will obviously be a part of PAS´ upcoming review of ISSAI 3000 and corresponding GUIDs.	
45	"Single drafting approach and style": based on which model? Would the selected model be a good model for performance audit?	PAS needs to take an active role in assessing how to present material on PA compared to the other types of audit. The "minimal" approach presented in the review is not necessarily the way to go for PA.
47	Unclear and inconsistent terminology: there may be a thin line between what some perceive as mere *terminology*, and what for performance audit may in fact lead to significant changes to the *content* and *meaning* of complex methodology. The PAS agrees with the intention to assess the framework for the sake of clarity and consistency of terminology.	PAS will participate in an active role in defining what the different elements represent in the case of PA: whether improvements are concerned with mere editorial changes and terminology, or if they in fact affect the content.

48	What is the precise meaning of "principle-based"? Will "principle-based" look the same for PA as for FA?	
50	The review update states: "For the framework to be considered purely principle-based, instructions should be turned to guidance". PAS has been open to this discussion within our committee, not least because we see benefits in keeping guidance material outside of due process (especially related to updates, format (not necessarily in the form of static material), etc.) That being said, whether this relates to the concept of a purely principle-based framework depends on the outcome of the discussion about what "principle-based" means for performance audit standards.	The question concerning guidance material should naturally be a part of a clarity project.
Annex 1	The review, as demonstrated in Annex 1, appears to have been conducted in a way that was not sufficiently mindful of the differences between performance auditing and other types of auditing, as well as the reasons for them (e.g. in the comparison between ISSAIs 100 and 300). Some examples: *Ethics and independence*: should not be dealt with for the sole purpose of logical consistency, assuming it is the same between performance audit and other branches of auditing. The issue is more fundamental and should not be dealt with as part of Component 1, where the objective is to ensure clarity in the framework. *Audit risk:* the drafting process lead to different wording from ISSAI 100 (e.g. specific reference to added value and a balanced report, which are concerns somewhat specific to performance audits as opposed to the more formalized reporting in financial auditing). *Fraud:* Considering the purpose of the review ("The review will neither question the formal requirements, nor make proposals for factual changes to the substance of those requirements (and therefore the way audits are done)") it seems irrelevant to demonstrate that there are no corresponding requirements for this specific topic in 300. The goal cannot be specifically for the documents to read more similar as, in this case, adding an explicitly stated requirement to identify risk of fraud would in fact change the focus of a performance audit objective. *Reporting:* it is obvious that a direct report on performance auditing (often a 100 pages of free text) should have different requirements compared to a formal statement like a financial report opinion. It is indeed debatable whether the current ISSAI 300 does a good job in trying to explain that, but the review process should be mindful of the reasons behind why ISSAI 300 is worded the way it is.	PAS advises against changing 300 based on the understanding demonstrated in the initial review process, as the decisive perspective is not one of merely comparing documents, but rather about navigating within the IFPP to find the relevant content. Simplifying for the sake of achieving an identical or matching structure (and linguistic consistency) with other documents, could be detrimental to the representation, application and implementation of the different audit types. If the goal is to achieve an identical structure across, that may lead to a misrepresentation of the purpose of a performance audit in this case. While comparing ISSAIs 100 and 300 is an important part of a clarity project and component 1, this has to be performed with due consideration to the complexity of performance audit.