

AUDIT QUALITY MATURITY MODEL (AQMM Rev v1.0)

By CA Roshan Bajaj

Co-Founder and Director

JPNR Corporate Consultants Pvt. Ltd.

Turbulent History

2001:

Enron Scandal:

The co. had been using accounting loopholes to hide billions of dollars of bad debt, while simultaneously increasing the co.'s earnings.

The scandal resulted in shareholders loosing over \$74 billion as Enron's share price collapsed from 90\$ to under \$1 within a year.

Impact:

Resulting in disappearance of one of the biggest audit firms, also led to the introduction of the concept of <u>Internal Financial Controls over Financial Reporting – IFCOFR</u>

2008:

Lehman Brothers Scandal:

During the 2008 financial crisis, it was discovered that the co. had hidden over \$50 billion in loans. These loans were disguised as sales using accounting loopholes.

Impact:

In addition to impacting the reputation of the auditor from what was considered poor auditing – resulted in significant revisions to new accounting standards (IFRS) and in auditing standards with revision to SA 700 and inclusion of SA 701 on key audit matters in 2015.

2009:

Satyam Scandal:

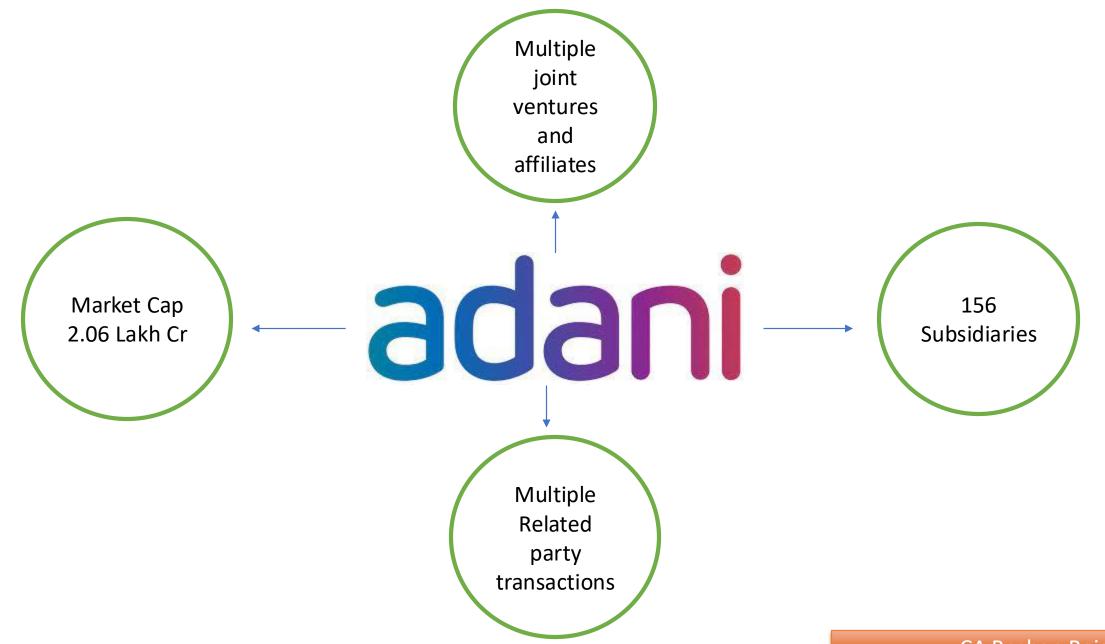
Co. had inflated revenue by \$1.5 billions.

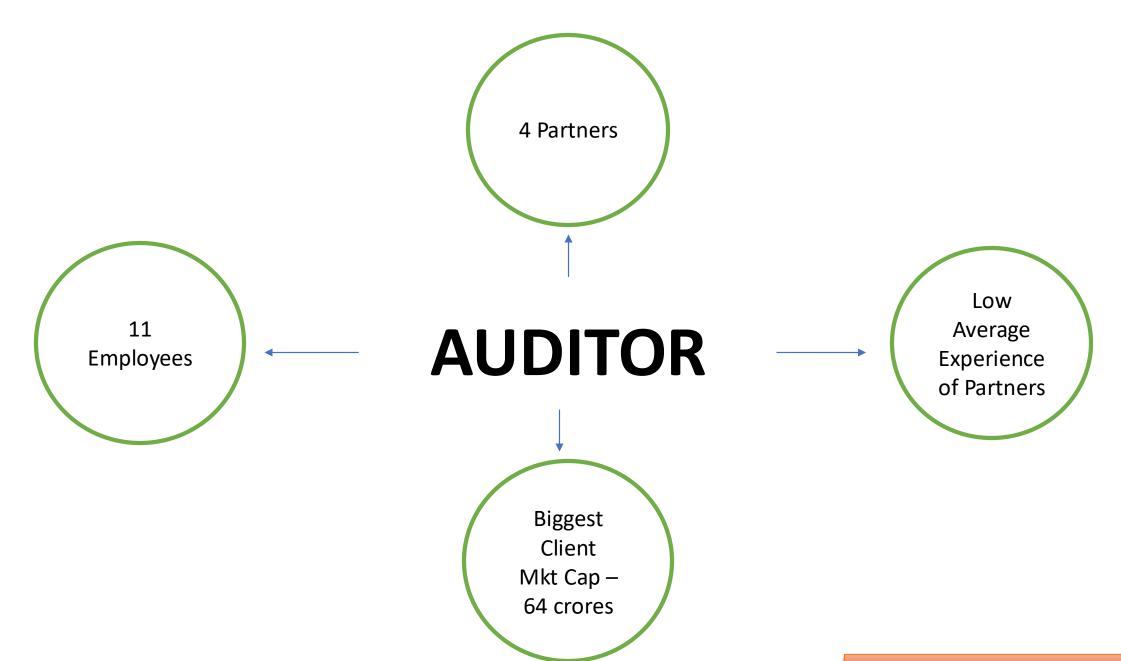
An investigation by CBI revealed that the founder and chairman, Ramalinga Raju, had falsified revenues, margins, and cash balances.

Impact:

The Auditors were banned for 2 years by Sebi.

Revision in regulations, auditing standards and reporting requirements in India.





Centre for Audit Quality

In order to have a more in-depth discussion on the qualitative components of the audit function and to create a favorable environment for conducting field research projects, the ICAI decided to open the Centre for Audit Quality at its Centre of Excellence in Jaipur.

The purpose is to:

- Provide confidence to the users of audited financial statements;
- Reliability;
- Improving audit quality;
- Consistency of audit execution.

Objective of CAQ:

- to develop Framework for Audit Quality
- to work on key elements of Audit Quality
- to develop Audit Quality Maturity Model
- to develop and promote Audit Quality Indicators
- identifying areas where competencies are good or lacking
- create trust in stakeholders and users of financial statements

CA Roshan Bajaj

AQMM v 1.0

- Audit quality measurement is a highly subjective matter
- AQMM has been developed by Centre for Audit Quality (CAQ), Jaipur
- AQMM is an amalgamation of a well researched set of Audit Quality Indicators (AQIs)
- A model launched for self-evaluating the current level of Audit Maturity;
- Identifying areas where competencies are good or lacking;
- Developing a road map for upgrading to a higher level of maturity.
- The maturity of an organization depends on the basis on which it functions as a whole and the individual activities that sum up.
- The level of scores applies to each section and not to any one section alone.
- AQMM was initially recommendatory but effective April 1, 2023 it becomes mandatory for firms meeting certain prescribed conditions.
- The self assessed rating of the firm would be subjected to testing by Peer Review Board (PRB)

Note:

- "Implementation Guide for Audit Quality Maturity Model Version 1.0 (AQMM v1.0)" has to be used **ONLY for self-evaluation by audit firms of their audit quality maturity level and taking steps to move up the maturity model.**
- The results of the self-evaluation conducted should NOT be published/displayed in any form/manner, until issuance of guidance in this regard by the ICAI, otherwise, it may be deemed to be a violation of the Code of Ethics of the Institute of Chartered Accountants of India.
- Upon self evaluation, the firm may approach CAQ or PRB voluntarily for getting peer review done of its self-assessment rating or else it can be done as a part of normal peer review cycle.
- The peer reviewed AQMM rating shall be published on ICAI website at a prescribed location

Peer Review Process

- Case 1: If peer review cycle due- AQMM can be conducted along with periodic peer review cycle, as an add-on service for not more than Rs. 30000/-
- Case 2: If peer review cycle not due- AQMM can be conducted by making an application in CAQ or PRB, for a cost not more than 20-25% of peer review cost.

No Additional Compliance

Applicability

The firms auditing the following types of entities are to mandatorily assess their level of audit quality maturity using the AQMM Rev v1.0 from 1st April 2023:

- A listed entity; or
- Banks other than co-operative banks (except multi-state co-operative banks); or
- Insurance Companies.

Note: However, firms doing only branch audits are not covered.

What are AQIs?

- Audit Quality Indicators (AQIs) are quantitative and qualitative measures of audit quality;
- They indicate the firm's historical, present and future ability to perform quality audits;
- It is a capacity building measure for Firms;
- These indicators help the firms to **monitor trends in quality** which would provide an insight into the functioning of the audit practice.

Key Elements of AQIs – At Firm Level

- Tone at the top
- Competency levels of firm's personnel
- Firm's independence policies
- Investment in people
- Investment in processes and technologies
- Relationship between audit quality and financial reporting

Section Categorisation

There are three Sections in this Model:



Section 1. Practice Management – Operation



Section 2. Human Resource Management



Section 3. Practice Management – Strategic / Functional

Section Scoring Reference

Sections	Total Possible Points
Section 1. Practice Management – Operation	280
Section 2. Human Resource Management	240
Section 3. Practice Management Strategic/Functional	80
Total	600

Competency Basis		Maximum Scores
Practice Management Operation	Quality Control for Engagements	80
	Technology Adoption	64
	Service Delivery – Effort Monitoring	36
	Quality Review Manuals or Audit Tool	24
	Work-flow - Practice manuals	16
	Benchmarking of Service Delivery	16
	Revenue, Budgeting & Pricing	16
	Practice areas of the firm	12
	Client Sensitisation	8
Total		280
Human Resource	Resources Turnover & Compensation Management	104
Management		
	Employee Training & Development	44
	Qualification Skill Set of Employees and Use of Experts	32
	Performance Evaluation Measures carried out by the Firm (KPIs)	32
	Resource Planning & Monitoring as per the Firm's Policy	28
Total		240
Practice Management –	Infrastructure – Physical & Others	48
Strategic/ Functional		
	Practice Management	20
	Practice Credentials	12
Total		80
Grand Total		600

Firm Maturity Ratings

Firm Levels	Based on Score Obtained	Interpretation	
Level 1	up to 25 % in each section	Indicates that the firm is very nascent -will have to take immediate steps to upgrade its competency or will be left lagging behind	
Level 2	above 25 % and up to 50 % in each section	Indicates firm has made some progress - will have to fine-tune further to reach the next level of competency	
Level 3	above 50 % and up to 75 % in each section	Indicates firm has made substantial progress - will have to fine-tune further to reach the highest level of competency	
Level 4	above 75 % in each section	Indicates firms that have made significant adoption of standards and procedures - Should focus on optimizing further	

Section 1 Practice Management -Operation

i. Revenue from audit and assurance services.

Score Basis

50% to 75% - 5 Points

Above 75% - 8 Points

(Min. 50 % of total revenue from audit and assurance services, consistently witnessed for a period of 3 years.)

ii. Does the firm have a Vision and Mission statement?

Does it address Forward looking practice statements/Plans?

If Yes – 4 Points

If No - 0 Points

Score Basis

i. Presence of Audit manuals containing the firm's methodology that ensures compliance with auditing standards and implementation thereof.

If Yes - 8 Points
If No - 0 Points

ii. Availability of **standard formats** relevant for audit quality (e.g., Engagement Letter (SA210), Representation Letters (SA580), Significant working Papers (SA230), reports (SA700) etc.)

If Yes - 8 Points

If No - 0 Points

1.3 Quality Review Manuals or Audit Tool	24 points
Competency Basis	Score Basis
i. Usage of Engagement acceptance checklists and adequate documentation thereof.	If Yes - 4 Points If No - 0 Points
ii. Evaluation of Independence for all engagements	If Yes - 4 Points If No - 0 Points
iii. Does the Firm maintain and use the engagement withdrawal/ rejection policy, templates, etc.?	If Yes - 4 Points If No - 0 Points
iv. Availability and use of standard checklists in performance of an Audit for Compliance with Accounting and Auditing Standards	If Yes - 4 Points If No - 0 Points
v. Availability and use of standard formats for audit documentation	If Yes - 4 Points If No - 0 Points
vi. Are the documents mentioned from (i) to (v) above reviewed and updated on a frequent basis	If Yes - 4 Points If No - 0 Points

i. Does the firm carry out a Capacity planning for each engagement?

ii Is a process of Budgeting & Planning of efforts required maintained

iii Are Budget vs Actual analysis of time and effort spent carried out to identify the costing and pricing?

iv Does the firm deploy technology for monitoring efforts spent

Score Basis

If Yes - 4 Points
If No - 0 Points

If Yes – 4 Points
If No – 0 Points

(based on % of engagements in which the compliance with budget vs actual is carried out)

i. Does the firm have a Quality review for all listed audit engagements as per para 60 of the SQC-1?

Is there a document of time spent for review of all engagements?

ii. Total engagements having concluded to be satisfactory as per quality review vs No. of engagements quality reviewed.

iii. No. of engagements without findings by ICAI, Committees of ICAI and regulators that require significant improvements.

Score Basis

If Yes - 8 Points
If No - 0 Points

Upto 10% - 0 11% to 30% - 4 31% to 50% - 8 51% to 70% - 12 71% to 90% - 16 >90% - 20

Based on % of Quality Review

Based on % of engagement meeting quality review standards

iv. Documentation of the firm in accordance with SQC 1.

(based on Presence in the below mentioned areas:

- (a) Leadership responsibilities for quality within the firm
- (b) Ethical requirements
- (c) Acceptance and continuance of client relationships and specific engagements
- (d) Human resources
- (e) Engagement performance
- (f) Monitoring

v. Does the firm have Accounting and Auditing Resources in the form of soft copies of archives, Q&As, firm thought leadership, a dedicated/ Shared Technical desk?

vi. Is appropriate time spent on understanding the business, risk assessment and planning an engagement?

Have risks been mitigated through performance of audit procedures?

Score Basis

If (b), (c), (e) Yes - 6 Points
If No - 0 Points

If (a), (d), (f) Yes - 6 Points

If No - 0 Points

If Yes - 8 Points
If No - 0 Points

i. Does the firm follow/ implement Standard delivery methodology – the adoption of audit manuals, adherence to practice standards and tools?

Score Basis

If Yes – 4 Points If No – 0 Points

ii. The number of statutory audit engagements reworked

0% to 5% - 0 6% to 15% - (-1) 16% to 30% - (-2) 31% to 50% - (-3) 51% to 100% - (-4)

iii. Number of client disputes (other than fees disputes) and how they are addressed.

0% to 5% - 0 6% to 15% - (-1) 16% to 30% - (-2) 31% to 50% - (-3) 51% to 100% - (-4)

Is the timing of audit interactions with management planned in such a way that integrates with the auditor's requirements so that audit timelines can be met?

If Yes – 12 Points If No – 0 Points

Score Basis

Awareness meetings and Knowledge dissemination meetings/ articles/document sharing with clients including:

- 1) Updating client on audit issues, formally effectiveness of the process of communication with management and those charged with Governance;
- 2) Updating client on changes in accounting, legal, audit aspects, etc. with client specific impact; and
- 3) Follow through on previous audit observations and updates to management and those charged with Governance.

If Yes - 8 Points
If No - 0 Points

Monitoring planned hours vs actual hours across engagement; the focus is on the existence of a monitoring mechanism.

If No - 0 Points

Competency Basis	Score Basis
competency basis	If Yes - 4 Points
Own E-mail domains, E-mail usage policies, etc.	If No - 0 Points
	II THE STORIES
Use of anti-virus and malware protection tools	If Yes - 4 Points
ose of after viras and marware protection tools	If No - 0 Points
	If Yes - 4 Points
Data security, etc.	If No - 0 Points
Cyber security measures	If Yes - 4 Points
Cyber security measures	If No - 0 Points
Awareness and Adoption of Technology for Service delivery – Say, use of Audit tools, usage of analytical tools, use of data visualization tools or adoption of an audit tool.	If Yes - 12 Points If No - 0 Points

i. Whether the client wise revenue is in compliance with the Code of Ethics (currently fees from one client should not exceed 40% of total revenue unless safeguards are put in place) and once the deferred clauses of Part A are implemented this will be reduced to 15%.

Score Basis

If Yes - 4 Points
If No - 0 Points

ii. Fee considerations and scope of services should not infringe upon the quality of work and documentation as envisaged in SQC 1 under Leadership is responsible for quality within the firm.

If Yes - 8 Points
If No - 0 Points

iii. Adherence to a minimum scale of fees recommended by ICAI.

Upto 50% of the engagements – 2
Above 50% - 4
For none - 0



Section 2 Human Resources Management engagements based on skill set requirement, experience, etc.?

Competency Basis

i. Does the firm have a process of Employee/ Resource Planning for the

Score Basis

If Yes - 4 Points
If No - 0 Points

ii. Methods/Tools used by the firm for Resource Allocation (use of spreadsheets, workflow tools, etc.).

If Yes - 4 Points
If No - 0 Points

iii. Is there a method of tracking the employee activity, to identity resource productivity (e.g., timesheet)?

Score Basis

iv. Does the firm maintain a minimum Staff to Partner Ratio, Partner to Manager, Manager to Articles, Client to Staff ratio, etc.?

If Yes - 8 Points
If No - 0 Points

v. Does the firm monitor the Utilisation & Realisation rate per employee?

If Yes - 4 Points
If No - 0 Points

vi. Does the firm document the resource plan for each engagement and file it for reference during the engagement?

Score Basis

i. Does the firm have an employee training policy?

If Yes - 4 Points
If No - 0 Points

ii. Number of Professional Development hours/days spent (Frequency) as a firm — per employee.

2 Points for general training
6 points for specialized technical training
(Junior Level – 60 hours/year;
Mid Level – 30 to 60 hours/year;
Partners – more than 30 hours/year)

iii. Employees are equipped with technological skill sets –
AI, Blockchain, Audit & Data analytical tools, etc. and
sponsored by the firm

If Yes - 8 Points
If No - 0 Points

iv. Whether the firm has a performance management culture that rewards high performing employees and those who demonstrate high levels of quality and ethics?

i. Does the Firm evaluate a team composition overall to build the Team Strength - say, Number of Managers, Assistant Managers, Paid Assistants, Article Assistants, Other Degree holders?

Score Basis

If Yes - 8 Points
If No - 0 Points

ii. Does the firm maintain and monitor the employee turnover ratio and identify measures to keep it minimal?

If Yes - 8 Points
If No - 0 Points

iii. Qualified professionals retained by the firm (based on the % of chartered accountants and articles available per partner)

10 and above- 20 points 8 to 9- 16 points

> 6 to 7- 12 points 4 to 5- 8 points

Upto 3- 4 points

iv. Does the firm evaluate the Employee relation with the firm (No. of Professionals vs. No. of years employed with firm) to identify reasons for turnover if any?

If Yes - 4 Points
If No - 0 Points

v. Statutory contributions wherever applicable, Health Insurance and other benefits, available in the firm for staff members and partners.

vi. Does the firm evaluate for which kind of audits does it have a revolving door (between different engagements) for people below partner level?

vii. Progress of people through an established framework and time commitment of Managers and Partners – Engagement level review and overall performance evaluation and rewards mechanism for differentiated performance levels.

viii. Access and use of technology, infrastructure, methodology for better enablement of day-to-day work / including favorable remote working policies

ix. Coaching and mentoring program investment, especially for women colleagues to enhance the diversity of audit leaders in the profession

Score Basis

If Yes - 4 Points
If No - 0 Points

If Yes - 8 Points
If No - 0 Points

If Yes - 8 Points
If No - 0 Points

2.3. Resources Turnover and Compensation Management	104 points
Competency Basis	Score Basis
x. Special policies to provide people time to rejuvenate especially after busy audit seasons.	If Yes - 4 Points If No - 0 Points
xi. Focused policies and support for staff well - being, engagement and communication.	If Yes - 8 Points If No - 0 Points
xii. An established mechanism to listen to people and their views and suggestions. Credible Employee survey and its outcome demonstrate how well people are taken care of and heard.	If Yes - 8 Points If No - 0 Points
xiii. Standards of recruiting people – Assessment methodology, evaluation of quality and fitment to the job and culture.	If Yes - 4 Points If No - 0 Points
xiv Are the employees of the firm compensated as per a defined approach where	

xiv. Are the employees of the firm compensated as per a defined approach where salary is mapped to the knowledge and experience level of the employee?

Score Basis

i. Number of Professionally qualified members – ACA/FCA

(If evaluation is being done for a firm that primarily offers Statutory and Tax Audit Services then only ACA / FCA should be considered for evaluation purposes.)

ii. Post Qualification Certifications obtained from professional bodies or similar organizations (DISA, IP, etc.) DISA and IP are courses that are required in Information System Audits. If qualified resource is not available in the firm, whether the services of expert are taken? Whether all partners have complied with CPE requirements of ICAI?

iii. Members with Specialization courses or Certifications

Upto 30% – 4 Points
31% to 50% – 8 Points
Above 50% – 12 Points
(based on the % of employees with necessary qualification or skill sets - including partners)

Applicable – 8 Points

Not Applicable – 0 Point

(Where firms are not involved in any Information systems audit/engagements with complex IT systems should not be rated for this competency)

Upto 30% – 4 Points 31% to 50% – 8 Points Above 50% – 12 Points

2.5. Performance evaluation measures carried out by the firm (KPI's)	32 points
Competency Basis	Score Basis
i. Does the firm have written KPIs for performance evaluation of the firm and partners?	If Yes - 8 Points If No - 0 Points
ii. Method for measurement and evaluation as mentioned above (i) are determined / specific.	If Yes - 8 Points If No - 0 Points
iii. There is a decided frequency for the evaluation and is consistently applied.	If Yes - 8 Points If No - 0 Points
iv. Are engagement partners reviewed based on the review results of the engagements of each partner.	If Yes - 8 Points If No - 0 Points

Section 3
Practice
Management —
Strategic/Functional

Score Basis

i. Does the firm have a balanced mix of experienced and new Assurance partners?

Avg. Partner experience > 5 years
- 4 points

Avg. Partner experience > 10 years

- 8 points

ii. Is the firm compliant with the ICAI Code of Ethics, Companies Act 2013 and other regulatory requirements in relation to Professional Independence and Conflict of Interest?

If Yes - 8 Points

If No - 0 Points

iii. Is there is a 'whistle blower' policy?

If Yes - 4 Points

If No - 0 Points

Score Basis

i. Number of Branches & Associates and network firms and affiliates.

Upto 3 – 2 Points 4 to 7 – 4 Points 8 to 15 – 6 Points More than 15 – 8 Points

ii. Are branch level activities Centralised/ Decentralised in accounting, Invoicing, and Payroll processing.

(Complete automation is not a mandate)

Centralised – 8 Points
Decentralised – 4 Points

iii. Physical & Logical Security of Information are extended and implemented across locations?

If Yes - 8 Points
If No - 0 Points

iv. Are there adequate DA tools and IT infrastructure available and are they being used for the relevant assignment?

If Yes - 12 Points
If No - 0 Points

v. Is the infrastructure adequate in terms of internet/intranet network bandwidth/ VPN/Wi-Fi etc. for remote working?

3.3. Practice Credentials	12 points
---------------------------	-----------

Comp	etency	Basis
------	--------	-------

Score Basis

i. Is the firm ICAI Peer Review certified?

If Yes - 4 Points
If No - 0 Points

ii. Empanelment with RBI / C&AG.

If Yes - 8 Points
If No - 0 Points

iii. Is there an advisory as well as a decision, to not allot work due to unsatisfactory performance by the CAG office?

If Yes – (-5) Points
If No - 0 Points

iv. Have any Government Bodies/ Authorities evaluated the performance of the firm to the extent of debarment/ blacklisting?

If Yes – (-10) Points
If No - 0 Points

v. Any negative assessment in the report of the Quality Review Board?

If Yes – (-5) Points
If No - 0 Points

vi. Has there been a case of professional misconduct on the part of a member of the firm where he has been proved guilty?

If Yes – (-5) Points
If No - 0 Points



Roadmap for moving up the next level of maturity



Step 1: Benchmarking

Benchmark the current maturity level of the firm and document a list of specific aspects that the Firm is currently lacking.



Step 2: Planning Initiatives

Convert the initiative to be taken into an action plan- with timelines quarterly/annual.



Step 3: Identifying resources and execution plan

Identify a cross-functional team for execution of the plan;

Make the execution of the plan an important part of the Key Result Areas/KPI of this team.

Define accountability for reporting progress and challenges in implementation.



Step 4: Assessing progress

Assess the progress by reevaluating against the AQMM v1.0 and re-visit the execution plan half-yearly



Step 5: Perform a review

The firm may have its AQMM voluntarily reviewed.

An external firm or a peer can review.

Internal inspection may also be performed.

It is recommended to perform peer review on a regular basis

References

ICAI Notice: https://www.icai.org/post/mandatory-evaluation-of-the-audit-quality-maturity-of-the-firms

AQMM Rev

v1.0: https://resource.cdn.icai.org/71488caq57512

Implementation

guide: https://resource.cdn.icai.org/71489caq5751
3.pdf

