

HARNESS THE POWER OF

JOINED UP BUSINESS REPORTING

Academic Perspectives on Assurance

Eric E. Cohen	PwC
Roger Debreceny	University of Hawai'i at Mānoa
Stephanie Farewell	University of Arkansas at Little Rock
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STILL HAVEN'T FOUND WHAT YOU'RE LOOKING FOR?	

HOSTED BY XBRL IRELAND



Research Paper Outline

- Background on XBRL and Assurance
 - Association problems nothing new
 - Background on benefits of XBRL for Assurance
- Communicating Audit Reports on XBRL-tagged Information
 - Companies, auditors, market, regulators
- Securing Assurance Reports, association
- Human Interaction knowing, trusting
- Inline XBRL best of/worst of, new ideas



RESEARCH ISSUES

Two Obvious Interconnected Tracks



"Mutually exclusive" goals

- Maintain clear separation for responsibility and authentication
- Make inseparable so stakeholders get complete message

Association Pre-XBRL

- Internet Financial Statements predate XBRL
 - Early SEC Internet Sweeps exposing predatory practices
- Association problems pre-date XBRL
 - Is the audit opinion safe from change by the client or other party?
 - Should the Web-based version of the original auditor's report reside at the auditor's, client's or other Web site?
 - What is the meaning of an audit report in a hyperlinked web environment?
 - Should the auditor allow hypertext links to the auditor's report?
 - Should the auditor allow hypertext links from the auditor's report?



Q: When Is a ...



... door not a door? A: When it's ajar.

... Financial Statement not a document? A: When it's digital.

http://pcaobus.org/Standards/Auditing/Pages/ AU9550.aspx

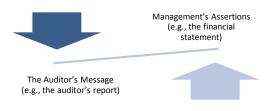
E-Reporting and the Auditor



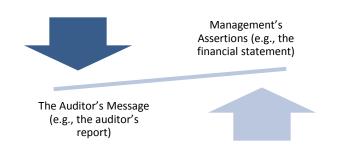
In March 1997^[1], the AITF issued its interpretation of AU 550 in the *Journal of Accountancy*, stating 'that electronic sites (including Internet sites) are a means of distributing information and are not "documents" as that term is used in SAS No. 8. Thus, auditors do not have an obligation pursuant to SAS No. 8, to read information in electronic sites or to consider the consistency of other information included in electronic sites with the original documents.' [1] http://www.aicpa.org/members/div/auditstd/opinion/apr97_3.htm

The interpretation is **TO THIS DAY** a PCAOB interim standard http://pcaobus.org/Standards/Auditing/Pages/AU9550.aspx





- The chair of that committee, John L. Archambault, reported on its deliberations in CPA Journal, November 1999
- Issue 1: What was the basis for the conclusion reached in Interpretation #4 to SAS No.8, Other Information in Electronic Sites Containing Audited Financial Statements?
- Discussion: On a given website, there may be **no clear boundaries** between the audited financial statements and other financial or nonfinancial information. Not only can a website include a substantial amount of information generated by the company (i.e., about products, employment, and nonfinancial data) but, through hyperlinks, it can also include information from outside sources. This information may also be continuously changing.
- It is not only impractical, but almost impossible for an auditor to access all of the information that is on or linked to a client's website. This is analogous to the auditor attempting to access all of the client's internal information, reports, or documents and all external information about the client from other sources. Thus, under SAS No. 8, a website is not considered to be a "document" as that term is used in AU section 550, and an auditor is not required to read the information on a website or to consider whether it is consistent with information in original documents.





Paper Assurance

DATA

PRESENTATION DOCUMENT

Management's Assertions (e.g., the financial statement)

The Auditor's Message (e.g., the auditor's report)



Report of Independent Accountant

Notes

We have audited the accompanying balance sheet of the ABC Company as of December 31, 20X1, and the related statements of income, and cash flows for the year then ended.

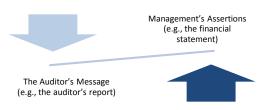
These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

. . .

The accompanying Notes to the Financial statements are an Integral part of these atatements

Background on XBRL and Association

- Auditor Association and XBRL ...
 - First theoretical thought highlighting what is covered and explicitly what is not covered by auditor opinion
 - Coping with lack of "borders" on the Internet
 - Providing new cross-referencing not possible on paper



Introductory <> Scope

INTRODUCTORY

We have audited the accompanying balance sheet of ABC Company, Inc. (the "Company") as of December 31, 20XX and the related statements of income, retained earnings, and cash flows for the year then ended. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

SCOPE...

OPINION

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Company as of December 31, 20XX, and the results of its operations and its cash flows for the year then ended in accordance with accounting principles generally accepted in (the country where the report is issued).

> AU 550/SAS 8 http://pcaobus.org/Standards/Auditing/Pages/AU550.aspx

"Assurance on a **Portion or Portions**"?

Discussion Topic III: Auditor Assurance on Other Information Outside the Financial Statements

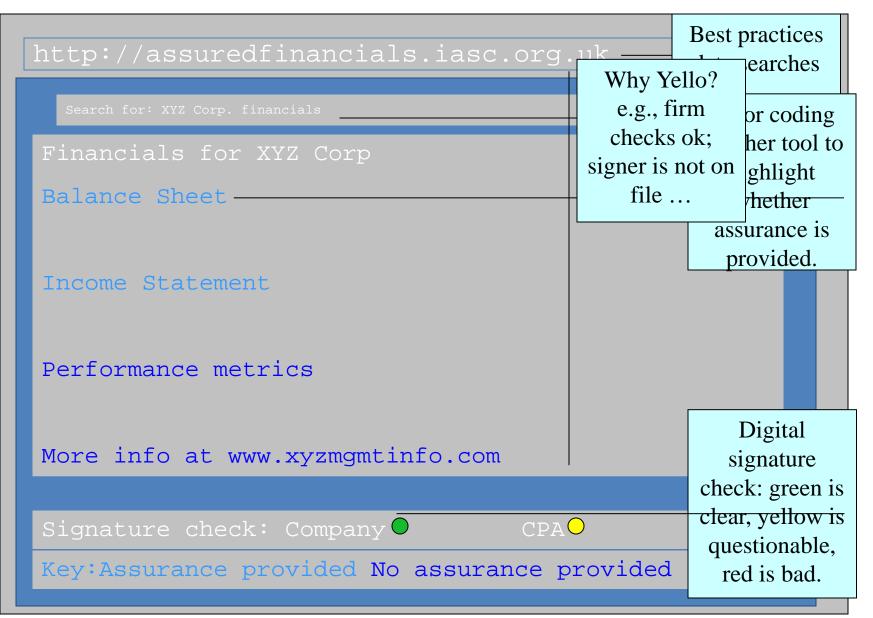
Another alternative to enhance the auditor's reporting model could be to require auditors to provide assurance on information outside the financial statements, such as management discussion and analysis ("MD&A") or other information (for example, non-GAAP information or earnings releases). An auditor providing assurance on information outside of the financial statements could improve the quality, completeness, and reliability of such information, providing investors and other users of financial statements with a higher level of confidence in information about the company that is provided by management. Therefore, this additional reporting could make an audit and auditor reporting more relevant to investors and other users of financial statements. See Appendix C for an illustration of an attachment to a possible revised standard auditor's report on MD&A.

Questions

- On what information should the auditor provide assurance (e.g., MD&A, earnings releases, non-GAAP information, or other matters)? Provide an explanation as to why.
- 9. If the auditor were to provide assurance on a portion or portions of the MD&A, what portion or portions would be most appropriate and why?
- 10. Would auditor reporting on a portion or portions of the MD&A affect the nature of MD&A disclosures? If so, how?
- 11. What are the potential benefits and shortcomings of implementing auditor assurance on other information outside the financial statements?

PCAOB Roundtable – Auditor's Reporting Model September 15, 2011

Fool-proof Agreed-Upon User Interface



Noto Bene: Data Level Assurance

- Indicating explicitly what is and what is *not* covered by assurance is **not** an immediate move to assurance on individual pieces of data outside of "taken as a whole"
- However, it is necessary should the market participants agree on an appropriate riskreward environment for providing assurance on individual pieces of data

http://raw.rutgers.edu/docs/wcars/23wcars/Presentations/23_WCAS_Presentation1.pdf

But Who Explicitly Discusses E Audit Reports?

- Australia: AUS 1050 -> GS 06
 - <u>http://www.auasb.gov.au/admin/file/conte</u> <u>nt102/c3/GS_006_12-3-10.pdf</u>

GS 006 (December 2007)

Guidance Statement GS 006 *Electronic Publication of the Auditor's Report*

Issued by the Auditing and Assurance Standards Board

New Zealand Institute of Chartered Accountants

AUDIT GUIDANCE STATEMENT 1003

AUDIT ISSUES RELATING TO THE ELECTRONIC PRESENTATION OF FINANCIAL STATEMENTS AND RELATED AUDITOR'S REPORTS

Issued by the Professional Standards Board of the New Zealand Institute of Chartered Accountants

ISA (UK and Ireland) 720 - Revised October 2012

Appendix

Electronic Publication of the Auditor's Report

Introduction

1. In the UK, section 430 of the Companies Act 2006 requires that a quoted company must

- New Zealand: ED/AGS-1003
 - <u>http://www.icanz.co.nz/StaticContent/d</u> <u>ownload/ags/edags1003.pdf</u>
 - http://www.nzica.com/Technical/Auditand-assurance/Standards-andguidance/~/media/NZICA/Docs/Tech%2 0and%20Bus/Audit/Standards%20and% 20Guidance/Audit%20Guidance%20Stat ements/AGS%201003%20-%20Audit%20issues%20relating%20to% 20the%20electronic%20presentation%2 0of%20financial%20statements.ashx
- UK: APB Bulletin 2001/1

http://www.frc.org.uk/getattachment/f4d 613fc-f44b-4061-9c86-9ed6eb30767d/ISA-%28UK-and-Ireland%29-720-Section-A-Revised-October-2012.aspx

- "The Electronic Publication of Auditor's Reports"
- The UK has allowed an auditor to provide services on online data even before XBRL.
- http://www.frc.org.uk/images/uploaded /documents/Bull_01-01.pdf

SEC: Auditor Involvement in XBRL

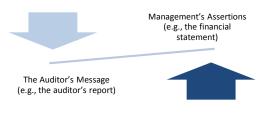
- We note that issuers can obtain third-party assurance under the PCAOB Interim Attestation Standard—AT sec. 101, Attest Engagements on interactive data, and can start and stop obtaining assurance whenever they choose.
- Although Rule 405 as adopted does not include a requirement that auditors' reports be tagged, the rules do not prohibit issuers from indicating in the financial statements (such as in a footnote) the degree of auditor involvement in the tagging process. Accordingly, we believe that an issuer can make clear the level of auditor involvement or lack thereof in the creation of the interactive data exhibit.

Management's Assertions (e.g., the financial statement)

The Auditor's Message (e.g., the auditor's report)

Background on XBRL and Association (Cont.)

- Association by "envelope theory" (SEC 2000) ...
 - BDO Spain
 - PwC on Voluntary filing program
- Management vs auditor annotation
- Use of digital signatures



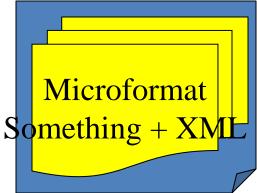
File Assurance

Dumb Document





"Smarter" Document?





US SEC and Electronic Disclosure

- 2000 "Envelope Theory"
- 2007 disclosure on Corporate Web Sites
- 2009 Audit on XBRI – but no audit report
- 2013 Twitter and so media suitable for disclosures

SEC Interpretation: Use of Electronic Media

4. Clarification of the "Envelope Theory"

The 1995 Release provided a number of examples designed to assist issuers and market intermediaries in meeting their delivery obligations through electronic media. One example provided that documents in close proximity on the same web site menu are considered delivered together.³⁵ Other examples confirmed the proposition that documents hyperlinked to each other are considered delivered together as if they were in the same paper envelope.³⁶ The premise underlying these examples has come to be called the "envelope theory."

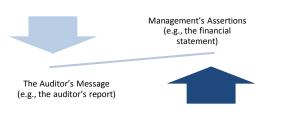
D01

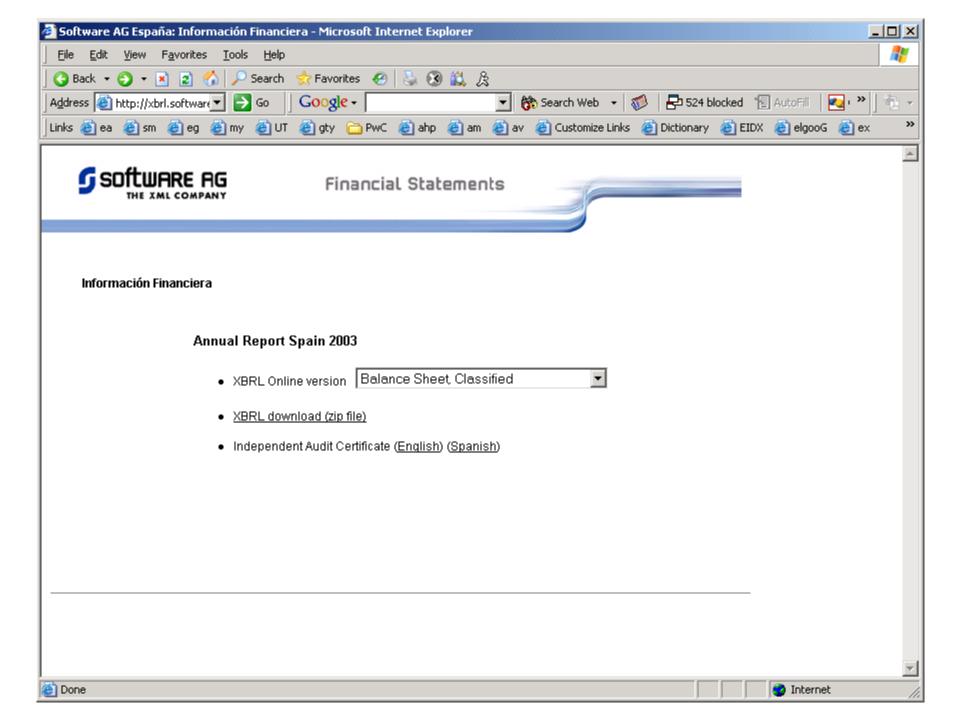
The purpose of these examples was to provide assurance to issuers and intermediaries that they are delivering multiple documents simultaneously to investors when so required by the federal securities laws. For example, in a registered offering, sales literature cannot be delivered to an investor unless the registration statement has been declared effective and a final prospectus accompanies or precedes the sales literature.³⁷ It is easy to establish concurrent delivery when multiple documents are included in one paper envelope that is delivered by U.S. postal mail or a private delivery service. When electronic delivery is used, however, it is somewhat more difficult to establish whether multiple documents may be considered delivered together. The guidance provided in the 1995 Release about the use of "virtual" envelopes was intended to alleviate this difficulty.

<u>http://www.sec.gov/rules/interp/34-</u> <u>42728.htm</u> May 1, **2000**

History of Association

- BDO Spain and Software AG Spain
- PwC and UTC, WR Grace under SEC VFP
- Deloitte NL and EY NL auditor report with hash
- Deloitte NL/EY NL and EY NL/BDO NL with digital signature





BDO letter-en.jpg (JPEG Image, 1694x2334 pixels) - Scale	🚰 http://xbrl.softwareag.es/spain/financial/results/download/pdf/BDO_letter-en.jpg - Microsoft Inter 🔤	- 🗆 ×
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AUDIT CER

🥝 Internet

AUDIT CERTIFICATE

And Fenes y Consultorea

 Peter Houdelet Partner of BDO Audiboria Auditores, S.L. with 3 hereby cestify that:

According to the application of the International Accounting S have reviewed the financial data of Software AGI Experia N December 51, 2003, exvressed in Trousand Eurov and Stowing a and me income from Jamary 1, 2013 to December 31, 2003 of 53

The programation of the financial data was the responsibility Company.

BDO Audiberia

BUU

Refer Houdelet Partner

Madrid, February 23, 2004

Organizació a bive de la Sectión 3.

Done

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🖄 Done

I, Peter Houdelet Partner of BDO Audiberia A hereby certify that:

According to the application of the Interna have reviewed the financial data of Softv December 31, 2003, expressed in Thousand and net income from January 1, 2003 to Dece

The preparation of the financial data wa Company.

W. R. Grace under PCAOB Staff Q&A

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🙋 Most Visited 🚞 Smart Bookmarks 📋 votd woot	EX-99 2 a07-29126 1ex99.htm EX-99
SEC E	
Form	
	Report of Independent Registered Public Accounting Firm on XBRL-Related Documents
Period of Report: 2007-	To the Shareholders and Board of Directors of W. R. Grace & Co.:
Filing Date Changed: 20 Documents: 7	We have examined the accompanying XBRL-Related Documents of W. R. Grace & Co. and its subsidiaries (the "Company"), presented as Exhibit 100 to the
	Company's Current Report on Form 8-K dated November 30, 2007, which reflect the data presented in the consolidated balance sheets and the related consolidated statements of operations, of cash flows, of shareholders' equity (deficit) and of comprehensive income (loss) included in Part II, Item 8 of the
Item 8.01: Other Events Item 9.01: Financial Statements and Exhibits	Company's Annual Report on Form 10-K for the year ended December 31, 2006. The Company's management is responsible for the XBRL-Related Documents. Our responsibility is to express an opinion based on our examination.
Table of submitted documents:	We also have audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States), the consolidated balance sheets as of December 31, 2006 and 2005, and the related consolidated statements of operations, of cash flows and of shareholders' equity (deficit) for the three years
Seq Type Document	in the period ended December 31, 2006, and in our report dated March 1, 2007, we expressed an unqualified opinion thereon. In addition, our opinion included the following modification: "On April 2, 2001, the Company and substantially all of its domestic subsidiaries voluntarily filed for protection under
18-K <u></u>	Chapter 11 of the United States Bankruptcy Code, which raises substantial doubt about the Company's ability to continue as a going concern in its present
3 EX-100.INS 0ra=20061231.xm	form."
4 EX-100.LAB <u>gra-20061231 lab.xml</u>	Our examination was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly,
5 EX-100.SCH gra-20061231.xsd	included examining, on a test basis, evidence supporting the XBRL-Related Documents. Our examination also included evaluating the XBRL-Related Documents for conformity with the applicable XBRL taxonomies and specifications and the content and format requirements of the Securities and Exchange
6 EX-100.CAL gra-20061231 cal.xml	Commission. We believe that our examination provides a reasonable basis for our opinion.
7 EX-100.PRE <u>gra-20061231 pre.xml</u>	In our opinion, the XBRL-Related Documents of W. R. Grace & Co. referred to above accurately reflect, in all material respects, the data presented in the
0001104659-07-086296	consolidated balance sheets and the related consolidated statements of operations, of cash flows, of shareholders' equity (deficit) and of comprehensive income (loss) included in Part II, Item 8 of the Company's Annual Report on Form 10-K for the year ended December 31, 2006, in conformity with the US
Filer Information:	GAAP - Commercial and Industrial Taxonomy, extensions specific to W. R. Grace & Co. (as included in Exhibit 100.SCH) and the XBRL Specifications
W R GRACE & CO (Filer) (0001045309)	(Version 2.1).
IRS No.: 650773649 State of Incorp.: DE Fis	/s/ PricewaterhouseCoopers LLP
Type: 8-K Act: 34 File No.: 001-13953 Film	
SIC: 2800 Chemicals & Allied Products	November 30, 2007
http://sec.gov/Archives/edg	Done 🛛 🕲 🌑 Now: Partly Sunny, 73° F 🖄 Tue: 82° F 🖄 Wed: 86° F 🌳

Communicating Audit Reports: Research Issues

- How do I know if the XBRL documents have been opined upon?
- How do we differentiate between an XBRL expression of an auditor's report on a non-XBRL formatted document, the XBRL expression of the auditor's report on the XBRL formatted document, and a report on the correctness of the expression of the auditor's report on the XBRL expressed in XBRL?
- Can the auditors develop metadata to indicate the coverage and manner of assurance without creating or at least envisioning/suggesting a visual interface? Would the market/regulators develop appropriate standardized user interfaces based on that metadata?
- Can different levels of assurance be expressed without causing too much confusion?
- Can we, and should we, differentiate between indicators from the filer that the instance document has been opinion opined upon and indicators from the auditor?
- Can we keep the auditor's opinion completely separate from management's assertions and yet have them appropriately intertwined?
- Can an application overlay the impact/coverage of the auditor's report over the financial statement, so the separation of responsibilities is maintained while making it clear what is, and what is not, covered?
- Would such ability open the door to new services, multiple levels of assurance within the same document or other changes?

XBRL

HOSTED BY XBRL IRELAND



Securing Assurance Reports

- Maintaining control over the assurance report
- Digital signatures (8)
- Temporal control over assurance reports (9/10)





Display on EY NL Web Site

XBRL financial statements and sustainability information

Ernst & Young Nederland LLP publishes its annual financial statements and GRI sustainability information that is included in its integrated annual review in eXtensible Business Reporting Language (XBRL). XBRL is an open technology standard for reporting and analyzing business and financial information. XBRL provides an identifying tag for each individual item of data which is computer readable and allows the information to be used interactively. Tags link data to generally agreed taxonomies (reporting language).

The following principles have been applied to prepare the XBRL instance documents:

- The XBRL instance documents solely include legally required information, for which elements are available in the taxonomy.
- Additional information in the financial statements and the sustainability part of the integrated annual review exceeding minimal (legal) requirements for which no standard taxonomy item is available is not included in the instance documents.

The EY XBRL Annual Financial Statements 2011/2012:

EY NL Annual Report 2012 - Consolidated

EY NL Annual Report 2012 - Company

The EY XBRL Sustainability information 2011/2012:

EY XBRL Sustainability information 2011/2012

The Assurance Reports:

XBRL Annual Financial Statements (pdf, 658kb)

XBRL Sustainability information (pdf, 554kb)

Assurance on the XBRL reports

Our auditors have provided assurance reports for both the annual financial statements in XBRL and the GRI sustainability information in XBRL. The assurance reports are based on the four principles that are outlined in the AICPA's "Principles and criteria for XBRL-formatted information", that has been published in August 2012: completeness of the XBRL files, mapping of the source information, consistency of the XBRL files with the source information and the structure of the XBRL files.

Our auditors have used digital signing software to sign the instance documents. With XML Signer Viewer the integrity of the instance documents can be verified and (optionally) the instance documents can be saved in their original state (without auditors signature) on which our auditors have provided assurance.

V:----- VDDI

http://www.ey.com/NL/nl/About-us/XBRLfinancial-statements-and-sustainabilityinformation

BDO Assurance Report



Tel: +31 (0)10 242 46 00 info@bdo.nl www.bdo.nl

BDO Audit & Assurance B.V. Fax: +31 (0)10 242 46 24 K.P. van der Mandelelaan 40, 3062 MB Rotterdam Nederland

Assurance Report

Scope

We have been engaged to report on the completeness, accuracy, mapping, and structure of the XBRLformatted information of Ernst & Young Nederland LLP over the period July 2, 2011 to June 29, 2012 contained in the accompanying instance documents: EY_NL_annualreport_2012_Consolidated.xbrl and EY NI annualreport 2012 Company.xbrl (hereafter in combination referred to as: the instance document EY Annual Report 2012). This instance document EY Annual Report 2012 is electronically signed by us for identification purposes. The instance document EY Annual Report 2012 is based on the financial statements for the year ended June 29, 2012 of Ernst & Young Nederland LLP.

An important characteristic of XBRL is the fact that multiple presentations of the XBRL Instance documents are possible, without a single one presentation being the 'normative' or 'default' presentation. The SBR "Handleiding voor het opstellen van jaarrekeningrapportages op basis van versie 6.0 van de Nederlandse Taxonomie (NT 2012)", as published by the SBR Program on December 1, 2011, contains basic guidelines for creating a presentation of an XBRL instance document in accordance with the requirements of Dutch law and accounting principles generally accepted in The Netherlands. Our examination and our opinion are limited to this way of presenting the instance document EY Annual Report 2012. We note explicitly that we do not provide data level assurance.

Signature Approach

- No association of assurance report with signature
- Instance document itself is digitally signed using XML Signature

– Instance (content within <xbrl></xbrl> altered)

• EY (the Reporter, not the auditor) links to a tool consumers may use to check the signature

T XML Signer Viewer	Document Signature(s)	×
Source XML file: C:\Users\ecohen007\Documents\Xml\Xbrl\Assurance\Security\EY\EY	Verification result	
Details about signed XML file Signers: Jacobus H.M. Boukens Show certificate	Signature not successfully verified WARNING FORGERY! File altered after signing Signature and validity of certificate and path not successfully signature of the certificate status information.	ccessfully verified.
Issuer name Digitale Services Secure eBusiness C Subject name Jacobus H.M. Boukens	Signed file: EY NI annualreport 2012 Company signed Date of verification: 2013-04-18, 08:46:00 GMT	
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General Details Certification Path	Signature information	
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	XML Digital Signature verification results	
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ОК	Copy report(s) to Clipboard View file	Close

Securing Assurance Reports: Research Issues

- What is information consumers' demand for security over assurance reports?
- What are the attitudes of senior management in public accounting firms and the accounting profession to the provision of security on assurance reports?
- What are the technical implications of undertaking XLink tagging on individual facts within the instance document that encompasses the financial statements? How will XLink tagging impact instance document file size?
- How would the provision of a digital signature on the XLink tagging be implemented in practice? Would national or international adoption of security standards for digital signatures be necessary within the XBRL community?

_ IRELAND

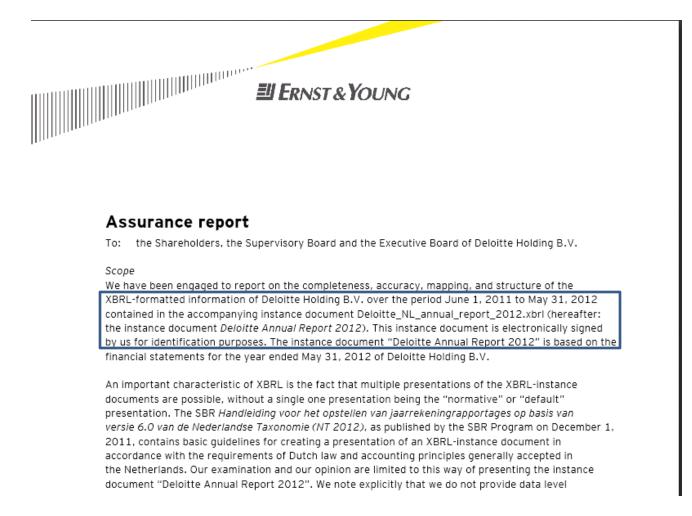


Display on Deloitte NL Web Site

Deloitte Netherlands 2011/2012

Keywords	Contents	XBRL		
		The eXtensible Business Reporting Language (XBRL) is no longer a niche topic. Many		
		governments and regulators around the world now embrace the digital reporting standard, while		
Report			looking into the possibilities to comply with XBRL mandates and benefit	
Annual Re	nort (86)	from the possibilities an XBRL implementation can offer. Deloitte Netherlands published its first XBRL annual report in 2009. This year, Deloitte		
	pon (00)	Netherlands publishes both its Financial and GRI sustainability report in XBRL.		
Sustainabi	ility Report (48)	http://2011-2012.deloitteannualreport.nl/xbrl/		
Performance		l≝ Download the Deloi	tte XBRL Annual Report 2011/2012	
		I≝I Download the Deloi	tte XBRL Sustainability report 2011/2012	
🔲 Financial r	esults (43)	l≚l Download our auditor's digital signature		
Highlights	(35)	Download the Assurance Report for the XBRL Financial Statement Explanatory notes to the XBRL Sustainability Report		
Innovation	(3)			
Market (12)			Assurance on the financial report in XBRL	
	,	Sustainability repo	 Building on previous experience, the assurance report is based on the four criteria that have been outlined in the AICPA's "Proposed principles and criteria for XBRL-formatted information". Completeness Mapping Accuracy Structure 	
			Our auditors have provided a digital signature to identify the instance document on our website, ensuring that the instance document on our website is the same as the document they have reviewed. Tools such as digiSeal reader can be used to check the validity of the signature file and the XBRL file.	

EY Report on Deloitte NL's Financials



Signature approach

- No association of assurance report with signature
- EY digitally signs a copy of the instance, provides the signed copy as S/MIME file
 - http://2011-

2012.deloitteannualreport.nl/fbcontent.ashx/downloa ds/2011-

2012/Deloitte NL annual report 2012.xbrl.p7m

• DELOITTE (the Reporter, not the auditor) links to a tool consumers may use to check the signature

Human Interaction with XBRL Assurance

- Integrating the assurance report into other forms of disclosure
- Research Issues

 Is it important to have a common visual interface for assurance across regulators and regions? If so, can this be facilitated without the audit profession assuming the risk it has been advised not to assume?





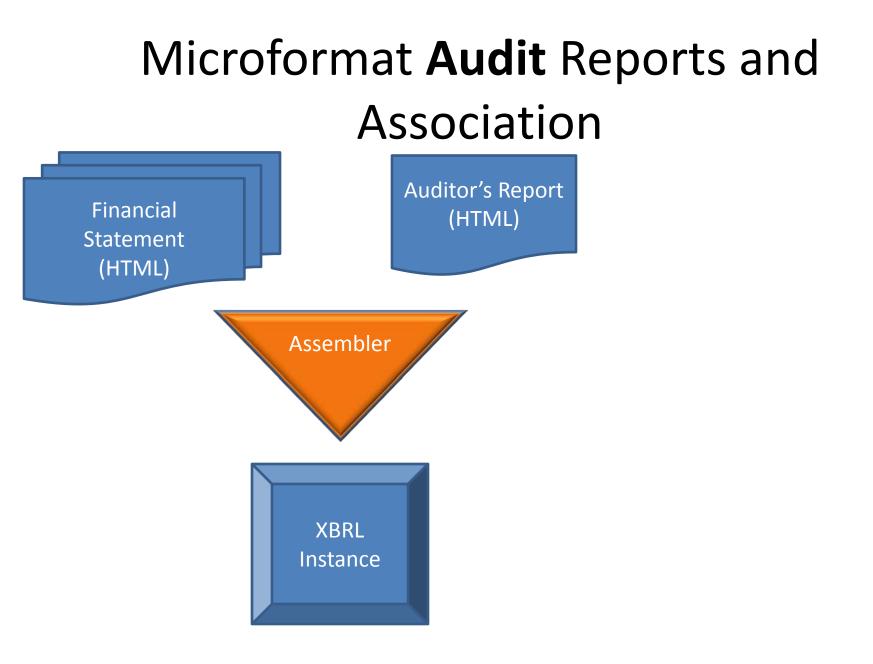
Inline XBRL (iXBRL)

- Background
- Why it changes the demand for XBRL assurance
- Connections between the audit report and iXBRL

XBRL IRELAND

• iXBRL limitations





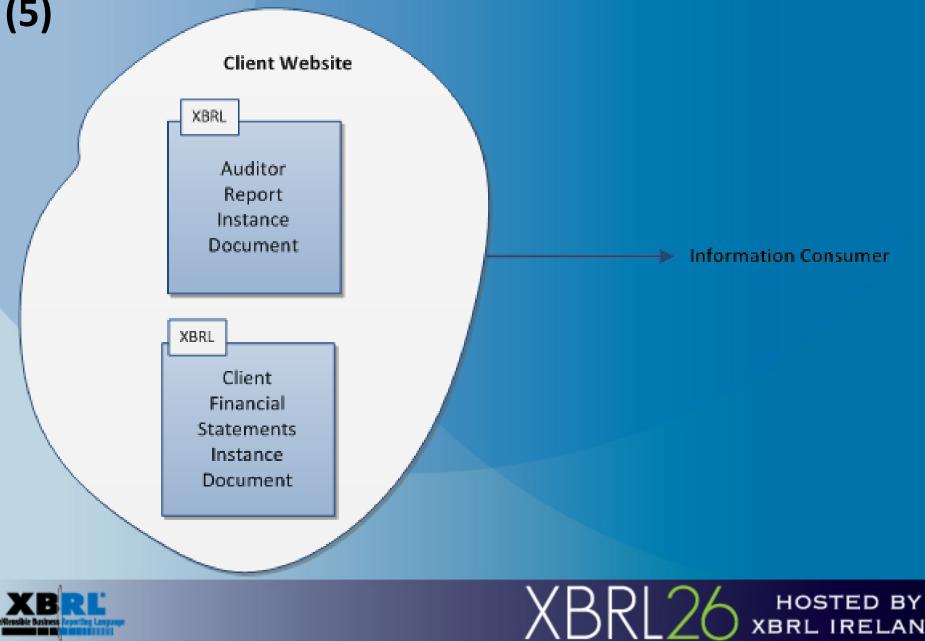
Inline XBRL Research Issues

- How does a business report expressed in Inline XBRL differ from one expressed in XBRL, HTML or XBRL and HTML?
- How does an auditor's report expressed in Inline XBRL differ from one expressed in XBRL (only), a textual format or both?
- How is the connection between the two impacted?
- Will principles of XBRL/Inline XBRL be added to the standard Notes disclosures?
- Does Inline XBRL provide more hangers and pointers than XBRL alone? Which make sense to leverage and encourage/mandate specifically?
- Would there be separate or combined auditor's reports on the Inline, differentiating between content and tagging assurance?
- Does the market need tools to differentiate between the "original" auditor report, the XBRL auditor report (on a resultant instance) and the INLINE auditor report (on the hybrid)? What are the benefits and concerns of separate reports for each layer of assurance and stacked/hierarchical assurance (like a Russian stacking doll)?
- Will short-term compromises made possible by Inline XBRL (such as removing the need for a presentation linkbase or retaining pointers to the document by presentation rather than content and context) delay possible gains in a move from document to data-focused?

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Document Level Assurance Report on Client Website

(5)



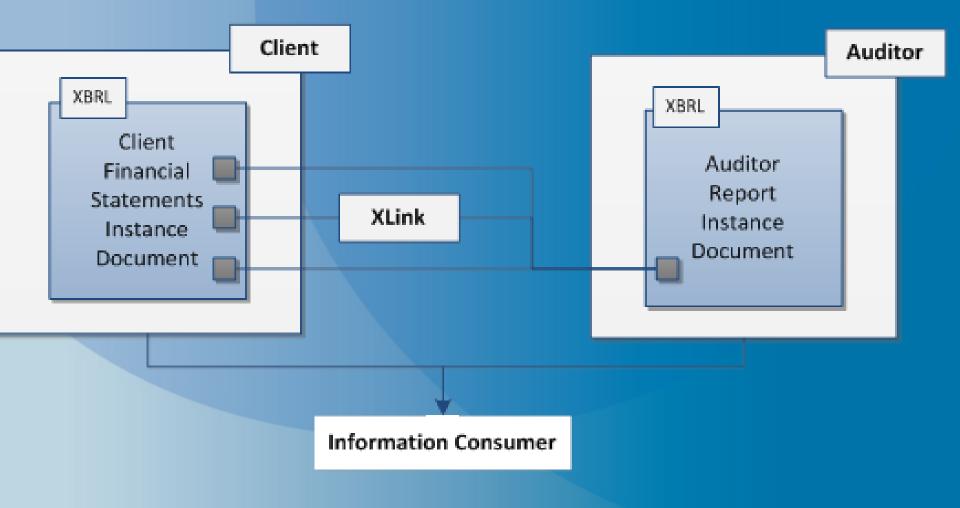
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Document Level Assurance Report: Document Level Assurance Report on Client and Auditor Website (6)



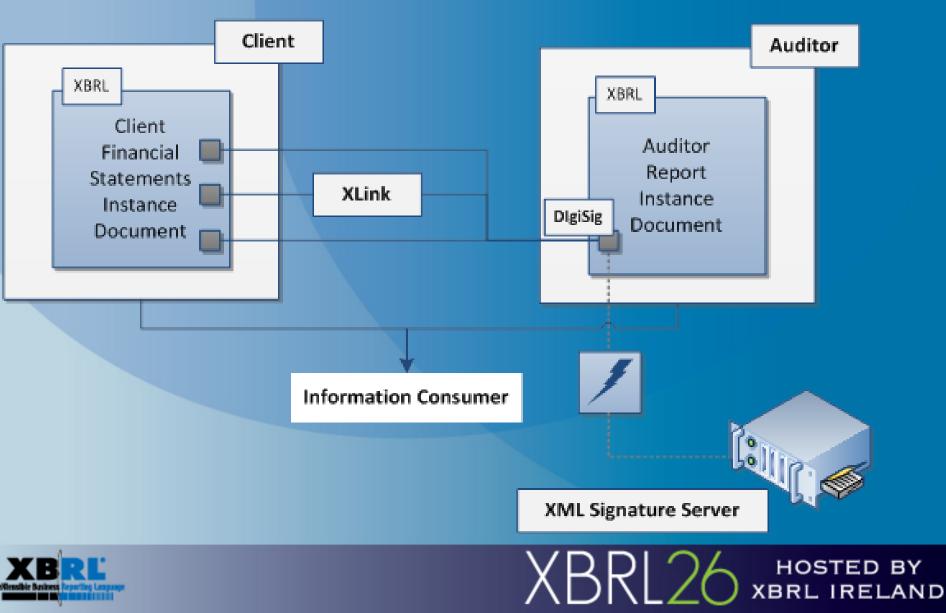
Document Level Assurance Report: XLink Identification of Covered Facts (7)



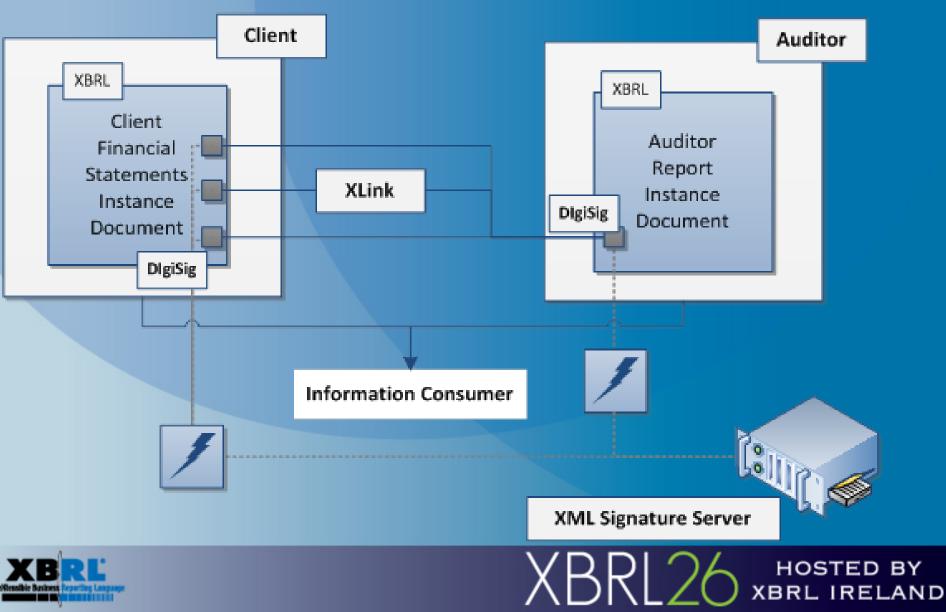


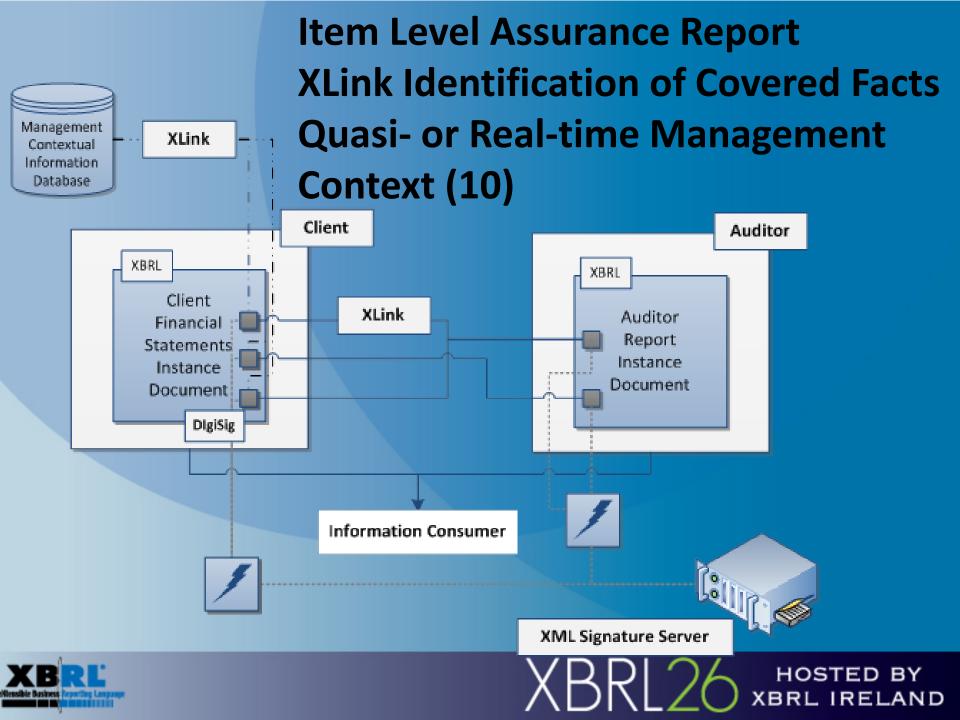
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Document Level Assurance Report: XLink Identification of Covered Facts (8)



Document Level Assurance Report XLink Identification of Covered Facts (9)





Conclusions

- Need for formal evaluation
- Need for market discussion and collaboration
- Need for prototypes
- Need for technical, legal and professional guidance and change
- Evolutionary process ... (WhatsApp exceeds Twitter)
 - Need agile solution



Questions?

Contact author: roger@debreceny.com





Risks

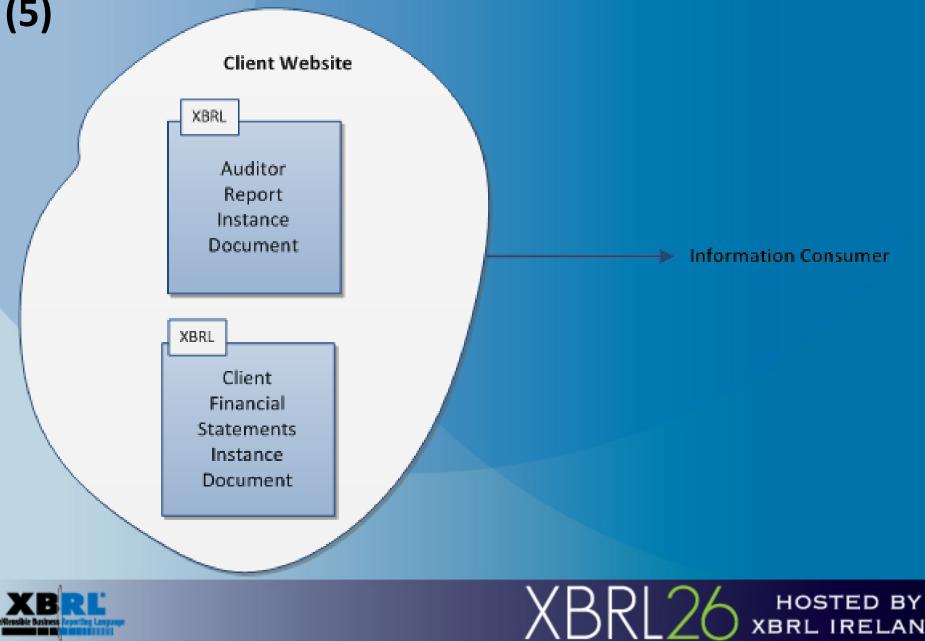
- Individual facts
 - Omission "It's not there at all."
 - Obscured "It's there, but not where I expected it."
 - Misstatement "It's there, but wrong in some way."
- Facts in context of each other
- Information as a whole

Challenges

- Professional standards
 - Management Reports
 - AICPA standard and PCAOB interim standard
 - Documents on the Internet aren't documents
 - PCAOB Staff Q&A
 - XBRL files on the Internet ARE "stand-alone documents"
 - Auditor Reports
 - Australia, NZ, UK
- Regulator standards
 - SEC doesn't permit auditor report on XBRL
 - Permits management to disclosure in Notes

Document Level Assurance Report on Client Website

(5)



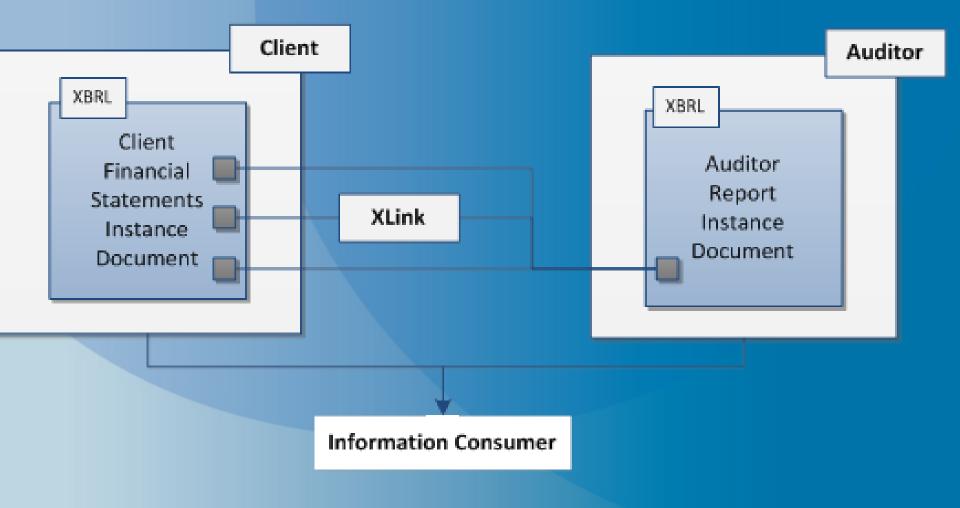
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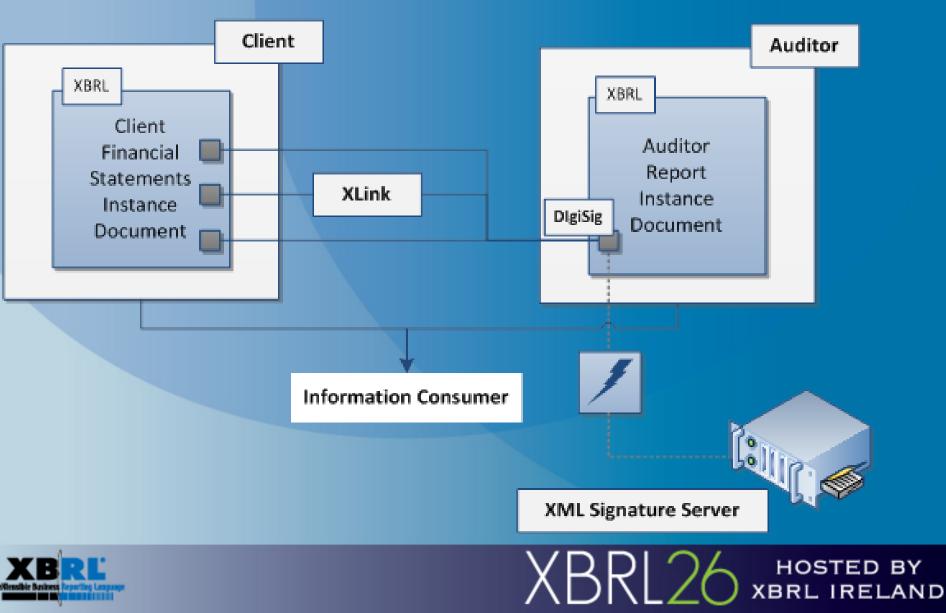
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Document Level Assurance Report: XLink Identification of Covered Facts (8)



Document Level Assurance Report XLink Identification of Covered Facts (9)

