American Institute of Certified Public Accountants (AICPA) Statement on Auditing Standards (SAS), "Consideration of Fraud in a Financial Statement Audit" (SAS 99), October 2002, was codified in AU §316, "Consideration of Fraud in a Financial Statement Audit." SAS 99 and AU §316 establish standards and provide guidance to independent auditors in obtaining reasonable assurance that financial statements are free of material misstatement, whether caused by error or fraud.

Government Auditing Standards, December 2011 Revision, contain professional standards and guidance for auditors of government entities and entities that receive government awards and government audit organizations and public accounting firms that perform GAGAS audits and attestation engagements.

This matrix crosswalks the requirements in SAS 99 and AU §316 to the requirements in the December 2011 GAGAS for government auditors to consider fraud when performing audits and attestation engagements.

AICPA		Government Auditing Standards (GAS) Requirements				
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon	
Codified in AU §316	requirements plus)				Procedures	
	Requirements for the Planning Phase					
(SAS 99 #12 &	(GAS 4.47) The	(GAS 6.30 and 6.31)	(GAS 5.07) Auditors	(GAS 5.49) If, on the	(GAS 5.59) If, on the	
AU §316.12) The	AICPA standards	Auditors should assess	should design the	basis of conducting the	basis of conducting the	
auditor has	require the auditor to	risks of fraud	engagement to provide	procedures necessary	procedures necessary	
responsibility to plan	apply the concept of	occurring that is	reasonable assurance	to perform a review,	to perform an agreed-	
and perform the audit	materiality	significant to the	of detecting fraud.	instances of fraud	upon procedures	
to obtain <i>reasonable</i>	appropriately in	objectives. When		come to the auditors'	engagement, instances	
assurance about	planning and	auditors identify		attention, auditors	of fraud come to the	
whether the financial	performing the audit.	factors or risks related		should determine	auditors' attention,	
statements are free of		to fraud that has		whether the existence	auditors should	
material misstatement,		occurred or is likely to		of such matters affects	determine whether the	
whether caused by		have occurred that they		the auditors' ability to	existence of such	
error or fraud.		believe are significant,		conduct or report on	matters affects the	
		they should design		the review.	auditors' ability to	
		procedures to provide			conduct or report on	
		reasonable assurance			the agreed-upon	
		of detecting such			procedures	
		fraud.			engagement.	

AICPA		Government Auditing Standards (GAS) Requirements				
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon	
Codified in AU §316	requirements plus)				Procedures	
(SAS 99 #13 &	(GAS 3.60 and 3.61)	(GAS 3.60 and 3.61)	(GAS 3.60 and 3.61)	(GAS 3.60 and 3.61)	(GAS 3.60 and 3.61)	
AU §316.13) The	Auditors must use	Auditors must use	Auditors must use	Auditors must use	Auditors must use	
auditor must exercise	professional judgment	professional judgment	professional judgment	professional judgment	professional judgment	
professional	in planning and	in planning and	in planning and	in planning and	in planning and	
skepticism. The	performing audits and	performing audits and	performing audits and	performing audits and	performing audits and	
auditor should have a	reporting results.	reporting results.	reporting results.	reporting results.	reporting results.	
mindset that a material	Professional judgment	Professional judgment	Professional judgment	Professional judgment	Professional judgment	
misstatement due to	includes exercising	includes exercising	includes exercising	includes exercising	includes exercising	
fraud could be present	reasonable care and	reasonable care and	reasonable care and	reasonable care and	reasonable care and	
regardless of any	professional	professional	professional	professional	professional	
experience with the	skepticism, which	skepticism, which	skepticism, which	skepticism, which	skepticism, which	
entity or any belief	includes a mindset	includes a mindset	includes a mindset	includes a mindset	includes a mindset,	
about management's	which assumes that	which assumes that	which assumes that	which assumes that	which assumes that	
honesty or integrity.	management is neither	management is neither	management is neither	management is neither	management is neither	
	dishonest nor of	dishonest nor of	dishonest nor of	dishonest nor of	dishonest nor of	
	unquestioned honesty.	unquestioned honesty.	unquestioned honesty.	unquestioned honesty.	unquestioned honesty.	
(SAS 99 # 14 &	(GAS 4.05) Auditors	(GAS 6.30) Audit team	No additional	No additional	No additional	
AU §316.14) Prior to	should evaluate	members <i>should</i>	requirement identified	requirement identified	requirement identified	
or in conjunction with	whether the audited	discuss among the	in GAGAS.	in GAGAS.	in GAGAS.	
information-gathering	entity has taken	team fraud risks,				
procedures, the audit	appropriate corrective	including factors such				
team should discuss	action to address	as individuals'				
the potential for	findings and	incentives or pressures				
material misstatement	recommendations from	to commit fraud, the				
due to fraud.	previous engagements	opportunity for fraud				
	that could have a	to occur, and				
	material effect on the	rationalizations or				
	financial statements or	attitudes that could				
	other financial data	allow individuals to				
	significant to the audit	commit fraud.				
	objectives.					

AICPA	Government Auditing Standards (GAS) Requirements					
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon	
Codified in AU §316	requirements plus)				Procedures	
(SAS 99 # 19 &	(GAS 3.72(b)) The	(GAS 3.72 (b)) and	(GAS 3.72 (b)) The	(GAS 3.72 (b)) The	(GAS 3.72 (b)) The	
AU §316.19) <i>Obtain</i>	auditor or team	6.30) The auditor or	auditor or team	auditor or team	auditor or team	
knowledge about the	collectively should	team collectively	collectively should	collectively should	collectively should	
entity.	possess <i>general</i>	should possess <i>general</i>	possess general	possess <i>general</i>	possess <i>general</i>	
 Make inquiries of 	knowledge of the	<i>knowledge</i> of the	knowledge of the	knowledge of the	<i>knowledge</i> of the	
management and	environment in which	environment in which	environment in which	environment in which	environment in which	
others to obtain	the audited entity	the audited entity	the audited entity	the audited entity	the audited entity	
their views about	operates and the	operates and the	operates and the	operates and the	operates and the	
risks of fraud.	subject matter under	subject matter under	subject matter under	subject matter under	subject matter under	
 Consider unusual 	review.	review. Auditors	review.	review.	review.	
or unexpected		should gather and				
relationships		assess information to				
identified in		identify risks of fraud				
planning the audit.		that are significant to				
 Consider whether 		the scope of the audit				
fraud risk factors		objectives or that could				
exist.		affect the findings and				
		conclusions.				
(SAS 99 #35-44 &	(GAS 4.21) To form a	(GAS 6.31) When	(GAS 5.07) Auditors	(GAS 5.49) If, on the	(GAS 5.59) If, on the	
AU §316.35-44)	basis for expressing an	auditors <i>identify</i>	should assess the risk	basis of conducting the	basis of conducting the	
Identify and assess	opinion on the design	factors or risks related	and possible effects of	procedures necessary	procedures necessary to perform an agreed-upon	
risks that may result in	or the design and	to fraud that has	fraud and	to perform a review,	procedures engagement,	
a material	operating effectiveness	occurred or is likely to	noncompliance with	instances of fraud	instances of fraud come	
misstatement due to	of an entity's internal	have occurred that they	provisions of laws,	come to the auditors'	to the auditors' attention,	
fraud (improper	control, as applicable,	believe are significant	regulations, contracts,	attention, auditors	auditors should	
revenue recognition,	the auditor would need	within the context of	and grant agreements	should determine	determine whether the	
management override	to plan and perform the	the audit objectives,	that could have a	whether the existence	existence of such matters	
of controls, etc.). The	examination to provide	they should <i>design</i>	material effect on the	of such matters affects	affects the auditors'	
auditor should evaluate	a high level of	<i>procedures</i> to provide	subject matter or an	the auditors' ability to	ability to conduct or	
whether programs and	assurance about	reasonable assurance	assertion about the	conduct or report on	report on the agreed-	
controls that address	whether the entity	of detecting such	subject matter of the	the review.	upon procedures	
identified risks of	maintained, in all	fraud. Assessing the	examination		engagement.	
material misstatement	material respects,	risk of fraud is an	engagement. When			

AICPA	Government Auditing Standards (GAS) Requirements					
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits Codified in AU §316	(includes all AICPA requirements plus)	Performance Audits	Examination	Review	Agreed-Upon Procedures	
due to fraud have been suitably designed and placed in operation.	effective internal control over financial reporting as of a point in time or for a specified period of time.	ongoing process throughout the audit and relates not only to planning the audit but also to evaluating evidence obtained during the audit.	risk factors are identified, auditors should document the risk factors identified, the auditors' response to those risk factors individually or in combination, and the auditors' conclusions.			
(SAS 99 #46 & AU §316.46) The auditor's response to the assessment of the risks of material misstatement due to fraud involves the application of professional skepticism in gathering and evaluating audit evidence. Specifically, the auditor should (a) design additional or different audit procedures to obtain more reliable evidence in support of specified financial statement account balances, classes of transactions, and related assertions, and (b) obtain	(GAS 4.08) If auditors become aware of abuse that could be quantitatively or qualitatively material to the financial statements or other financial data significant to the audit objectives, auditors should apply audit procedures specifically directed to ascertain the potential effect on the financial statements or other financial data significant to the audit objectives. After performing additional work, auditors may discover that the abuse represents potential fraud.	(GAS 6.31) When auditors identify factors or risks related to fraud that has occurred or is likely to have occurred that they believe is significant to audit objectives, they should design procedures to provide reasonable assurance of detecting such fraud.	(GAS 5.07) Auditors should assess the risk and possible effects of fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements that could have a material effect on the subject matter or an assertion about the subject matter of the examination engagement. When risk factors are identified, auditors should document the risk factors identified, the auditors' response to those risk factors individually or in combination, and the auditors' conclusions.	No additional requirement identified in GAGAS.	No additional requirement identified in GAGAS.	

AICPA	Government Auditing Standards (GAS) Requirements					
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits Codified in AU §316	(includes all AICPA requirements plus)	Performance Audits	Examination	Review	Agreed-Upon Procedures	
corroboration of management's explanations or representations concerning material matters.						
			he Execution Phase			
(SAS 99 # 68 – 75 & AU §316.68) Assessment of risk should be ongoing throughout the audit (evaluating the evidence; evaluating the accumulated results of the audit procedures; responding to identified misstatements)	(GAS 4.08) If auditors become aware of abuse that could be quantitatively or qualitatively material to the financial statements or other financial data significant to the audit objectives, auditors should apply audit procedures specifically directed to ascertain the potential effect on the financial statements or other financial data significant to the audit objectives. After performing additional work, auditors may discover that the abuse represents potential fraud.	(GAS 6.31 and 6.32) Assessing the risk of fraud is an ongoing process throughout the audit and relates not only to planning the audit but also to evaluating evidence obtained during the audit. When information comes to the auditors' attention indicating that fraud that is significant may have occurred, auditors should extend the audit steps and procedures to determine whether fraud has likely occurred and, if so, determine its effect on the audit findings.	(GAS 5.07) Auditors should assess the risk and possible effects of fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements that could have a material effect on the subject matter or an assertion about the subject matter of the examination engagement. When risk factors are identified, auditors should document the risk factors identified, the auditors' response to those risk factors individually or in combination, and the auditors' conclusions.	(GAS 5.49) If, on the basis of conducting the procedures necessary to perform a review, instances of fraud come to the auditors' attention, auditors should determine whether the existence of such matters affects the auditors' ability to conduct or report on the review.	(GAS 5.59) If, on the basis of conducting the procedures necessary to perform an agreed-upon procedures engagement, instances of fraud come to the auditors' attention, auditors should determine whether the existence of such matters affects the auditors' ability to conduct or report on the agreed-upon procedures engagement.	

AICPA	Government Auditing Standards (GAS) Requirements					
SAS 99 Requirements	Financial Audits			Attestation		
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon	
Codified in AU §316	requirements plus)				Procedures	
Financial Audits Codified in AU §316 (SAS 99 #83 & AU §316.83) Documenting the auditor's consideration of Fraud. The auditor should document the following: • team discussion, • procedures performed, • fraud risks identified and the auditor's response, • why improper revenue recogni-tion was not a risk, • Results of procedures	(includes all AICPA	Performance Audits (GAS 6.79) Auditors should prepare audit documentation in sufficient detail to enable an experienced auditor, having no previous connection to the audit, to understand the nature, timing, extent, and results of audit procedures performed, the audit evidence obtained and its source, and the conclusions reached, including evidence that supports the auditors'	Examination (GAS 5.16 (a)) Auditors should prepare attest documentation in sufficient detail to provide a clear understanding of the work performed, the evidence obtained and its source; and the conclusions reached. Auditors should prepare documentation in sufficient detail to enable an experienced auditor, having no previous connection to			
performed to address the risk of management override of controls. Other conditions that caused the auditor to believe additional auditing procedures were required. The nature of the communications about fraud made to management, the audit committee, and others.		significant judgments and conclusions.	the engagement, to understand from the documentation the nature, timing, extent, and results of procedures performed and the evidence obtained and its source and the conclusions reached, including evidence that supports the auditors' significant judgments and conclusions.	the engagement, to understand from the documentation the nature, timing, extent, and results of procedures performed and the evidence obtained and its source and the conclusions reached, including evidence that supports the auditors' significant judgments and conclusions.	understand from the documentation the nature, timing, extent, and results of procedures performed and the evidence obtained and its source and the conclusions reached, including evidence that supports the auditors' significant judgments and conclusions.	

AICPA		Government Auditing Standards (GAS) Requirements					
SAS 99 Requirements	Financial Audits		, , , ,	Attestation			
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon		
Codified in AU §316	requirements plus)				Procedures		
No additional AICPA	(GAS 4.09) Laws,	(GAS 6.35) Laws,	(GAS 5.10) Laws,	(GAS 5.10) Laws,	(GAS 5.10) Laws,		
requirement identified.	regulations, or policies	regulations, or policies	regulations, or policies	regulations, or policies	regulations, or policies		
	might require auditors	might require auditors	might require auditors	might require auditors	might require auditors		
	to report indications of	to report indications of	to report indications of	to <i>report indications</i>	to report indications of		
	certain types of fraud	certain types of fraud	certain types of fraud	of certain types of	certain types of fraud		
	to law enforcement or	to law enforcement or	to law enforcement or	<i>fraud</i> to law	to law enforcement or		
	investigatory	investigatory	investigatory	enforcement or	investigatory		
	authorities <i>before</i>	authorities <i>before</i>	authorities <i>before</i>	investigatory	authorities <i>before</i>		
	performing additional	performing additional	performing additional	authorities <i>before</i>	performing additional		
	audit procedures.	audit procedures.	procedures. When	performing additional	procedures. When		
	When investigations or	When investigations or	investigations or legal	procedures. When	investigations or legal		
	legal proceedings are	legal proceedings are	proceedings are	investigations or legal	proceedings are		
	initiated or in process,	initiated or in process,	initiated or in process,	proceedings are	initiated or in process,		
	auditors should	auditors should	auditors should	initiated or in process,	auditors should		
	evaluate the impact on	evaluate the impact on	evaluate the impact on	auditors should	evaluate the impact on		
	the current audit. In	the current audit. In	the current	evaluate the impact on	the current		
	some cases, it may be	some cases, it may be	engagement. In some	the current	engagement. In some		
	appropriate for the	appropriate for the	cases, it may be	engagement. In some	cases, it may be		
	auditors to work with	auditors to work with	appropriate for the	cases, it may be	appropriate for the		
	investigators and/or	investigators and/or	auditors to work with	appropriate for the	auditors to work with		
	legal authorities, or	legal authorities, or	investigators and/or	auditors to work with	investigators and/or		
	withdraw from or defer	withdraw from or defer	legal authorities, or	investigators and/or	legal authorities, or		
	further work on the	further work on the	withdraw from or defer	legal authorities, or	withdraw from or defer		
	audit engagement or a	audit or a portion of	further work on the	withdraw from or	further work on the		
	portion of the	the audit to avoid	engagement or a	defer further work on	engagement or a		
	engagement to avoid	interfering with an	portion of the	the engagement or a	portion of the		
	interfering with an	investigation.	engagement to avoid	portion of the	engagement to avoid		
	investigation.		interfering with an	engagement to avoid	interfering with an		
			investigation.	interfering with an	investigation.		
				investigation.			

AICPA		Government A	uditing Standards (GAS) Requirements	
SAS 99 Requirements	Financial Audits			Attestation	
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon
Codified in AU §316	requirements plus)				Procedures
		Requirements for t	he Reporting Phase		
(SAS 99 #79 &	(GAS 4.06) Auditors	(GAS 7.18, 7.21, 7.22)	(GAS 5.20, 5.24, 5.25)	(GAS 5.20, 5.24, 5.25)	(GAS 5.20, 5.24, 5.25)
AU §316.79)The	should report all	Auditors should report	Auditors <i>should report</i>	Auditors <i>should report</i>	Auditors <i>should report</i>
auditor should report	instances of fraud and	instances of fraud,	all instances of fraud	all instances of fraud	all instances of fraud
<i>fraud</i> to the	illegal acts unless	noncompliance with	and noncompliance	and noncompliance	and noncompliance
appropriate level of	inconsequential.	provisions of laws,	with provisions of laws	with provisions of laws	with provisions of laws
management, unless	When auditors	regulations, contracts,	or regulations that	or regulations that	or regulations that
involving senior	conclude that <i>fraud</i>	or grant agreements, or abuse that have occurred	have a material effect	have a material effect	have a material effect
management, then it	that has an effect on	or are likely to have	on the subject matter	on the subject matter	on the subject matter
should be reported to	the financial	occurred and are	or an assertion about	or an assertion about	or an assertion about
the audit committee.	statements that is	significant within the	the subject matter and	the subject matter and	the subject matter and
	more than	context of the audit	any other instances	any other instances	any other instances
	inconsequential, either	objectives. When	that warrant the	that warrant the	that warrant the
	has occurred or is	auditors conclude that	attention of those	attention of those	attention of those
	likely to have	fraud either has occurred	charged with	charged with	charged with
	occurred, they should	or is likely to have	governance.	governance.	governance.
	include the relevant	occurred, they should	When auditors	When auditors	When auditors
	information in their	report the matter as a finding.	conclude that <i>fraud</i>	conclude that <i>fraud</i>	conclude that <i>fraud</i>
	audit report.	Determining whether or	that has a material	that has a material	that has a material
	Determining whether	how to communicate to	effect on the subject	effect on the subject	effect on the subject
	and how to	officials of the audited	matter or an assertion	matter or an assertion	matter or an assertion
	communicate <i>fraud</i>	entity fraud that does	about the subject	about the subject	about the subject
	that is inconsequential	not warrant the	matter has occurred or	matter has occurred or	matter has occurred or
	is a matter of	attention of those	is likely to have	is likely to have	is likely to have
	professional judgment.	charged with	occurred, they should	occurred, they should	occurred, they should
	Auditors should	governance is a matter of	include the relevant	include the relevant	include the relevant
	document such	the auditors' professional	information in their	information in their	information in their
	communications.	judgment. Auditors should document such	report.	report.	report.
		communication.	Determining whether	Determining whether	Determining whether
		communication.	or how to	or how to	or how to
			communicate to entity	communicate to entity	communicate to entity
			officials <i>fraud that</i>	officials fraud that	officials fraud that
			does not warrant the	does not warrant the	does not warrant the

AICPA	Government Auditing Standards (GAS) Requirements				
SAS 99 Requirements	Financial Audits			Attestation	
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon
Codified in AU §316	requirements plus)				Procedures
			attention of those	attention of those	attention of those
			charged with	charged with	charged with
			governance is a matter	governance is a matter	governance is a matter
			of professional	of professional	of professional
			judgment.	judgment.	judgment.
(SAS 99 #82 &	(GAS 4.30, 4.31)	(GAS 7.24, 7.25)	(GAS 5.29, 5.30)	(GAS 5.29, 5.30)	(GAS 5.29, 5.30)
AU §316.82) The	Auditors should report	Auditors should report	Auditors should <i>report</i>	Auditors should <i>report</i>	Auditors should <i>report</i>
auditor has a duty to	known or likely fraud	known or likely fraud,	known or likely fraud	known or likely fraud	known or likely fraud
report potential fraud	directly to parties	directly to parties	directly to parties	directly to parties	directly to parties
outside the entity to	outside the audited	outside the audited	outside the audited	outside the audited	outside the audited
comply with legal and	entity (a) when entity	entity (a) when entity	entity (a) when entity	entity (a) when entity	entity (a) when entity
regulatory	management fails to	management fails to	management fails to	management fails to	management fails to
requirements; to a	satisfy legal or	satisfy legal or	satisfy legal or	satisfy legal or	satisfy legal or
successor auditor when	regulatory	regulatory	regulatory	regulatory	regulatory
asked; in response to a	requirements to report	requirements to report	requirements to report	requirements to report	requirements to report
subpoena; or to a	such information to	such information to	such information to	such information to	such information to
funding agency if	external parties	external parties	external parties	external parties	external parties
receiving government	specified in law or	specified in law or	specified in law or	specified in law or	specified in law or
financial assistance.	regulation or (b) when	regulation or (b) when	regulation or (b) when	regulation or (b) when	regulation or (b) when
	entity management	entity management	entity management	entity management	entity management
	fails to take timely and	fails to take timely and	fails to take timely and	fails to take timely and	fails to take timely and
	appropriate steps to	appropriate steps to	appropriate steps to	appropriate steps to	appropriate steps to
	respond to known or	respond to known or	respond to known or	respond to known or	respond to known or
	likely <i>fraud</i> that (1) is	likely <i>fraud</i> that (1) is	likely fraud that (1) is	likely fraud that (1) is	likely fraud that (1) is
	significant to the	significant to the	likely to have a	likely to have a	likely to have a
	findings and	findings and	material effect on the	material effect on the	material effect on the
	conclusions and (2)	conclusions, and (2)	subject matter and (2)	subject matter and (2)	subject matter and (2)
	involves funding	involves funding	involves funding	involves funding	involves funding
	received directly or	received directly or	received directly or	received directly or	received directly or
	indirectly from a	indirectly from a	indirectly from a	indirectly from a	indirectly from a
	government agency,	government agency	government agency,	government agency,	government agency,
	The reporting above is	The reporting above is	The reporting above is	The reporting above is	The reporting above is
	in addition to any	in addition to any	in addition to any	in addition to any	in addition to any

AICPA		Government A	uditing Standards (GAS) Requirements	
SAS 99 Requirements	Financial Audits			Attestation	
Financial Audits	(includes all AICPA	Performance Audits	Examination	Review	Agreed-Upon
Codified in AU §316	requirements plus)				Procedures
	legal requirements to	legal requirements to	legal requirements to	legal requirements to	legal requirements to
	report such	report such	report such	report such	report such
	<i>information</i> directly to	information directly to	<i>information</i> directly to	<i>information</i> directly to	<i>information</i> directly to
	parties outside the	parties outside the	parties outside the	parties outside the	parties outside the
	audited entity.	audited entity.	entity. Auditors	entity. Auditors	entity. Auditors
	Auditors should	Auditors should	should comply with	should comply with	should comply with
	comply with these	comply with these	these requirements	these requirements	these requirements
	requirements even if	requirements even if	even if they have	even if they have	even if they have
	they have resigned or	they have resigned or	resigned or been	resigned or been	resigned or been
	been dismissed from	been dismissed from	dismissed from the	dismissed from the	dismissed from the
	the audit prior to its	the audit prior to its	engagement prior to its	engagement prior to its	engagement prior to its
	completion.	completion.	completion.	completion.	completion.