



# Memorandum

Accessible Version

**Date:** April 28, 2025

**To:** GAO's Financial Management and Assurance (FMA) Team  
Council of the Inspectors General on Integrity and Efficiency  
Financial Audit Community

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**Subject:** *Professional Standards Update No. 96*, January through March 2025

To alert you to changes in professional standards, we periodically issue *Professional Standards Updates* (PSU).<sup>1</sup> These updates highlight the effective dates of recently issued standards and guidance related to engagements conducted in accordance with *Government Auditing Standards*.<sup>2</sup> PSUs contain summary information only, and those affected by a change should refer to the respective standard or guidance for details.

This PSU has two sections:

- Section I identifies select standards and guidance with their respective effective dates. Section I contains standards effective for
  - audits of financial statements for periods ending after December 31, 2024;
  - attestation reports dated after December 31, 2024; and
  - accounting for reporting periods beginning after October 15, 2023.
- Section II identifies select standards and guidance that were issued from January 2025 through March 2025.

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<sup>1</sup>Previous PSUs can be found on the [Professional Standards Updates](#) web page.

<sup>2</sup>GAO, *Government Auditing Standards: 2024 Revision*, [GAO-24-106786](#) (Washington, D.C.: February 2024).

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# ***Professional Standards Update No. 96***

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## Section I: Effective Dates for Select Standards and Guidance

This section identifies select standards and guidance with their respective effective dates. In general, the standard setters mentioned in this section are those with standards and guidance that relate to auditing government entities. Table 1 is an overview. Detailed information follows the table. Those affected should refer to the respective standard or guidance for more information.

**Table 1: Effective Dates for Select Standards and Guidance**

Standard setter	Standard or guidance	Standards and guidance issued and effective dates
Government Accountability Office	Government Auditing Standards and other guidance	<p><b>Effective for financial audits, attestation engagements, and reviews of financial statements for periods beginning on or after December 15, 2025, and for performance audits beginning on or after December 15, 2025:</b></p> <p><a href="#">Government Auditing Standards 2024 Revision</a></p> <p><b>Effective upon issuance:</b></p> <p><a href="#">Financial Audit Guidance: FY 2024 and FY 2025 Audit Procedures for Government Land</a> (issued November 2023)</p>
American Institute of Certified Public Accountants (AICPA)	Statements on Auditing Standards (SAS), Statements on Standards for Attestation Engagements (SSAE), and other guidance	<p><b>Effective for audits of financial statements for periods beginning on or after June 30, 2023:</b></p> <p><a href="#">SAS No. 147</a>, <i>Inquiries of the Predecessor Auditor Regarding Fraud and Noncompliance With Laws and Regulations</i></p> <p><b>Effective for engagements for periods beginning on or after December 15, 2025:</b></p> <p><a href="#">SAS No. 146</a>, <i>Quality Management for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards</i></p> <p><a href="#">SSAE No. 23</a>, <i>Amendments to the Attestation Standards for Consistency With the Issuance of AICPA Standards on Quality Management</i></p> <p><b>Effective for engagements for periods ending on or after December 15, 2026:</b></p> <p><a href="#">SAS No. 149</a>, <i>Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors and Audits of Referred-to Auditors)</i></p>
Federal Accounting Standards Advisory Board (FASAB)	Statements of Federal Financial Accounting Standards (SFFAS), interpretations, technical bulletins, technical releases, and other guidance	<p><a href="#">SFFAS 59</a>, <i>Accounting and Reporting of Government Land</i><sup>a</sup> (issued July 2021)</p> <p><b>Effective upon issuance:</b></p> <p><a href="#">SFFAS 63</a>, <i>Omnibus Amendments 2024-1: Amending Statements of Federal Financial Accounting Standards 38, 49, and Technical Bulletin 2011-1</i> (issued April 2024)</p> <p><a href="#">Technical Bulletin 2024-1</a>, <i>Seized and Forfeited Digital Assets</i> (issued June 2024)</p> <p><b>Effective for reporting periods beginning after September 30, 2025:</b></p> <p><a href="#">SFFAS 64</a>, <i>Management's Discussion and Analysis: Rescinding and Replacing SFFAS 15</i></p>
Financial Accounting Standards Board (FASB)	Accounting Standards Updates (ASU)	To view the details and effective dates of recent ASUs, <a href="#">click here</a> .
Governmental Accounting Standards Board (GASB)	Accounting statements, technical bulletins, and implementation guides	<p><b>Effective for fiscal years beginning after December 15, 2023:</b></p> <p><a href="#">GASB Statement No. 101</a>, <i>Compensated Absences</i></p> <p><b>Effective for fiscal years beginning after June 15, 2024:</b></p> <p><a href="#">GASB Statement No. 102</a>, <i>Certain Risk Disclosures</i></p> <p><b>Effective for fiscal years beginning after June 15, 2025:</b></p> <p><a href="#">GASB Statement No. 103</a>, <i>Financial Reporting Model Improvements</i></p> <p><a href="#">GASB Statement No. 104</a>, <i>Disclosure of Certain Capital Assets</i></p>

Source: GAO analysis of standards setters' effective dates.

<sup>a</sup>SFFAS 59 requires certain information to be presented as required supplementary information (RSI) for fiscal year 2022 through fiscal year 2025. In fiscal year 2026, the statement requires such RSI to transition to note disclosures.

## **A. AUDITING AND ATTESTATION STANDARDS AND GUIDANCE**

### **Government Accountability Office**

#### **Government Auditing Standards**

**Effective for financial audits, attestation engagements, and reviews of financial statements for periods beginning on or after December 15, 2025, and for performance audits beginning on or after December 15, 2025:**

- [\*\*Government Auditing Standards 2024 Revision\*\*](#) (February 2024). The 2024 revision contains major changes from, and supersedes, *Government Auditing Standards* 2018 Revision Technical Update April 2021. Specifically, chapter 5, “Quality Management, Engagement Quality Reviews, and Peer Review,” in the 2024 revision replaces chapter 5, “Quality Control and Peer Review,” in the 2018 revision. In addition, this revision adds application guidance to chapter 6, “Standards for Financial Audits.” The 2024 revision requires an audit organization to design and implement its system of quality management by December 15, 2025. An evaluation of the audit organization’s system of quality management is required by December 15, 2026. Early implementation is permitted.

#### **Other Guidance**

**Effective upon issuance:**

- [\*\*Financial Audit Guidance: FY 2024 and FY 2025 Audit Procedures for Government Land\*\*](#) (November 2023). This audit guidance provides procedures for auditors to apply to the reporting of government land when performing audits of federal entities’ financial statements relating to Statement of Federal Financial Accounting Standards (SFFAS) 59, *Accounting and Reporting of Government Land*. These audit procedures are designed to obtain additional information for fiscal years 2024 and 2025 to (1) better understand the extent to which measurement and presentation of land information is consistent with SFFAS 59 and (2) identify any preparation and audit challenges related to reporting government land. The Federal Accounting Standards Advisory Board plans to consider preparation and audit challenges that preparers and auditors have identified during the transition and, as appropriate, take actions to address them before the information transitions to the note disclosures.

### **American Institute of Certified Public Accountants (AICPA)**

#### **Statements on Auditing Standards (SAS)**

**Effective for audits of financial statements for periods beginning on or after June 30, 2023:**

- [\*\*SAS No. 147\*\*](#), *Inquiries of the Predecessor Auditor Regarding Fraud and Noncompliance With Laws and Regulations* (June 2022). This statement supersedes SAS No. 122, *Statements on Auditing Standards: Clarification and Reconciliation*, as amended, section 210, Terms of Engagement. This statement requires an auditor, once management authorizes the predecessor auditor to respond to inquiries from the auditor, to inquire of the predecessor auditor regarding identified or suspected fraud or noncompliance with laws or regulations.

**Effective for engagements for periods beginning on or after December 15, 2025:**

- [\*\*SAS No. 146\*\*](#), *Quality Management for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards* (June 2022). This statement supersedes SAS No. 122, *Statements on Auditing Standards: Clarification and Reconciliation*, as amended, section 220, Quality Control for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards. It also amends various AU-C sections in AICPA Professional Standards. This statement addresses the specific responsibilities of the auditor regarding quality management at the engagement level for an audit of financial statements, and for other engagements conducted in accordance with generally accepted auditing standards, and the related responsibilities of the engagement partner. SAS No. 146 is part of the AICPA’s new standards relating to quality management. These standards relating to quality

management are designed to improve the audit organization's risk assessment and audit quality. Find more information on AICPA quality management resources [here](#).

**Effective for engagements for periods ending on or after December 15, 2026:**

- [SAS No. 149](#), *Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors and Audits of Referred-to Auditors)* (March 2023). This statement supersedes SAS No. 122, *Statements on Auditing Standards: Clarification and Recodification*, as amended, section 600, *Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors)*. It also amends various AU-C sections in AICPA Professional Standards. This statement addresses special considerations that apply to a group audit, including when component auditors are involved or when the group auditor refers to the audit of a referred-to auditor. The requirements and guidance in this statement refer to, or expand on, the application of other relevant AU-C sections to a group audit.

Statements on Standards for Attestation Engagements (SSAE)

**Effective for engagements beginning on or after December 15, 2025:**

- [SSAE No. 23](#), *Amendments to the Attestation Standards for Consistency With the Issuance of AICPA Standards on Quality Management* (June 10, 2024). This statement amends four SSAEs to align certain concepts with the AICPA standards on quality management issued in June 2022. This statement also amends the concept of *other practitioners* by introducing two new terms, *participating practitioner* and *referred-to practitioner*, to replace the term *other practitioner*. The revised standards are SSAE No. 18, AT-C section 105; SSAE No. 19, AT-C section 215; SSAE No. 21, AT-C section 205; and SSAE No. 22, AT-C section 210.

**B. ACCOUNTING STANDARDS AND GUIDANCE**

**Federal Accounting Standards Advisory Board (FASAB)**

Standards, Interpretations, Technical Bulletins, and Technical Releases

[Statement of Federal Financial Accounting Standards \(SFFAS\) 59](#), *Accounting and Reporting of Government Land* (paras. 4–14: Basic Presentation) (July 2021). This statement

- requires reclassifying general property, plant, and equipment (G-PP&E) land as a noncapitalized asset for periods beginning after September 30, 2025;
- requires acreage reporting of G-PP&E land and stewardship land using these predominant use subcategories: conservation and preservation land, operational land, and commercial use land;
- clarifies the definition for the stewardship land category; and
- requires consistent and comparable disclosures of information for land.

This statement requires a phase-in approach for reporting on government land. Requirements for the initial phase became effective for reporting periods beginning after September 30, 2021. Acreage information by predominant use is reported in required supplementary information for fiscal year 2022 through fiscal year 2025. This information will transition to basic information within note disclosures in fiscal year 2026, when the asset dollar amounts for G-PP&E land and permanent land rights are removed from the balance sheet. Early adoption is not permitted.

**Effective upon issuance:**

- [SFFAS 63](#), *Omnibus Amendments 2024-1: Amending Statements of Federal Financial Accounting Standards 38, 49, and Technical Bulletin 2011-1* (April 2024). This statement retains the requirement to report oil, gas, and other natural resource information as required supplementary information by rescinding (1) paragraphs 6 and 31 of SFFAS 38, *Accounting for Federal Oil and Gas Resources*, and (2) paragraphs 5 and 31 of Technical Bulletin 2011-1, *Accounting for Federal Natural Resources Other Than Oil and Gas*. This statement also removes the “where available” exception and provides flexibility

for developing estimates in accordance with paragraph 24.b of SFFAS 49, *Public-Private Partnerships: Disclosure Requirements*.

- [Technical Bulletin 2024-1](#), *Seized and Forfeited Digital Assets* (June 2024). This technical bulletin clarifies existing reporting and disclosure requirements for seized and forfeited digital assets related to their unique characteristics, which were not considered in developing SFFAS 3, *Accounting for Inventory and Related Property*. The technical bulletin further clarifies a difference in treatment between central bank digital currencies and all other digital assets. This technical bulletin also provides clarifying guidance for measuring market value.

**Effective for reporting periods beginning after September 30, 2025:**

[SFFAS 64](#), *Management's Discussion and Analysis: Rescinding and Replacing SFFAS 15* (September 2024). This statement updates the guidance for management's discussion and analysis (MD&A) by rescinding and replacing SFFAS 15, *Management's Discussions and Analysis*. This statement improves MD&A guidance by

- merging and updating relevant content from Statement of Federal Financial Accounting Concepts (SFFAC) 3, *Management's Discussion and Analysis*, and SFFAS 15, for FASAB's budgetary integrity, operating performance, stewardship, and systems and controls reporting objectives;
- providing a concise set of principle-based standards that will guide management in preparing a discussion and analysis of the reporting entity's financial position and condition;
- encouraging flexibility for management to prepare MD&A content efficiently and effectively; and
- guiding management in the preparation of a balanced, concise, integrated, and understandable MD&A that is useful for all users, including those who are not experts in federal government financial matters.

Early implementation is permitted.

**Financial Accounting Standards Board (FASB)**

**Accounting Standards Updates (ASU)**

- The FASB Accounting Standards Codification® (FASB Codification) is the sole source of authoritative generally accepted accounting principles other than Securities and Exchange Commission (SEC)–issued rules and regulations that apply only to SEC registrants. FASB issues ASUs to communicate changes to the FASB Codification, including changes to nonauthoritative SEC content. ASUs are not authoritative standards. To view details and the effective dates of recent ASUs, [click here](#).

**Governmental Accounting Standards Board (GASB)**

**Statements, Technical Bulletins, and Implementation Guides**

**Effective for fiscal years beginning after December 15, 2023:**

- [GASB Statement No. 101](#), *Compensated Absences* (June 2022). This statement updates the recognition and measurement guidance for compensated absences. Earlier application is encouraged.

**Effective for fiscal years beginning after June 15, 2024:**

- [GASB Statement No. 102](#), *Certain Risk Disclosures* (December 2023). This statement establishes financial reporting requirements for risks related to vulnerabilities due to certain concentrations or constraints. It amends National Council on Governmental Accounting Interpretation 6, *Notes to the Financial Statements Disclosure*, paragraph 5. Earlier application is encouraged.

**Effective for fiscal years beginning after June 15, 2025:**

- [GASB Statement No. 103](#), *Financial Reporting Model Improvements* (April 2024). This statement improves key components of the financial reporting model to enhance its effectiveness in providing information that is essential for decision-making and assessing a government's accountability. This



statement also addresses certain application issues. Topics include management's discussion and analysis; unusual or infrequent items; presentation of the proprietary fund statement of revenues, expenses, and changes in fund net position; major component unit information; and budgetary comparison information. Earlier application is encouraged.

- [\*\*GASB Statement No. 104\*\*](#), *Disclosure of Certain Capital Assets* (October 2024). This statement requires certain types of capital assets to be disclosed separately in the capital assets note disclosures required by GASB Statement No. 34, *Basic Financial Statements—and Management's Discussion and Analysis—for State and Local Governments*. It also establishes requirements, including additional disclosures, for capital assets held for sale. Earlier application is encouraged.

## Section II: Select Standards and Guidance Issued January 2025 through March 2025

This section includes select standards and related guidance issued during the period covered by this *Professional Standards Update* (PSU)—January 2025 through March 2025—to the extent that such materials were publicly available as of March 31, 2025. The section also identifies the standard setters whose publications and updates we review to prepare PSUs. These updates highlight the recent issuance and key points of standards and related guidance. This PSU only summarizes the standards or guidance. Those affected by these changes should refer to the respective standard or guidance for details.

### A. AUDITING AND ATTESTATION STANDARDS AND GUIDANCE

#### Government Accountability Office (GAO)

##### Government Auditing Standards

- Government Auditing Standards were not updated during the period covered by this PSU.

##### Other Guidance

- [\*\*Standards for Internal Control in the Federal Government: 2024 Exposure Draft\*\*](#) (June 2024). This proposed revision to the Green Book provides additional requirements, guidance, and resources for addressing risks related to fraud, improper payments, information security, and the implementation of new or substantially changed programs, such as emergency assistance programs, when designing, implementing, and operating an effective internal control system. Extant principles and documentation requirements are clarified, and additional documentation requirements are proposed in the exposure draft. Other updates include an emphasis on prioritizing preventive control activities and highlighting management's responsibility for internal control at all levels and within all functions in the entity's organizational structure, such as program and financial managers. The revised Green Book is anticipated in late spring 2025.

#### American Institute of Certified Public Accountants (AICPA)

##### Statements on Auditing Standards (SAS)

- There were no new SASs issued during the period covered by this PSU.

##### Statements on Standards for Attestation Engagements (SSAE)

- There were no new SSAEs issued during the period covered by this PSU.

##### Professional Standards<sup>3</sup>

##### *Code of Professional Conduct [ET] – March 2025 Update*

- This update revises the "Section 529 Plans" interpretation (ET sec. 1.240.070) under the "Independence Rule."

##### Other Guidance<sup>4</sup>

- *AICPA Audit and Accounting Guide: Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting (SOC 1®)* (March

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<sup>3</sup>The *AICPA Professional Standards* is an annual publication of the AICPA. It is the comprehensive source of professional standards and interpretations issued by the AICPA, such as auditing and attestation standards and interpretations, accounting and review services pronouncements, Statements of Position, and the AICPA Code of Professional Conduct. A digital subscription to AICPA professional literature is necessary to view timely updates to the professional standards covered by PSUs.

<sup>4</sup>Other guidance issued by the AICPA as professional literature includes audit and accounting guides, audit risk alerts, and technical questions and answers. The guides and other titles are AICPA available-for-purchase publications. A digital subscription to AICPA professional literature is necessary to view timely updates to the guidance covered by PSUs.

2025). The 2025 edition of this guide provides guidance to service auditors engaged to examine and report on a service organization's controls over the services it provides to user entities when those controls are likely to be relevant to user entities' internal control over financial reporting. The guide is relevant to engagements performed under AT-C section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. The revisions include additional guidance for topics such as subservice organizations, software-as-a-service providers, and the reasonableness of control objectives.

## **B. ACCOUNTING STANDARDS AND GUIDANCE**

### **Federal Accounting Standards Advisory Board (FASAB)**

#### Standards, Interpretations, Technical Bulletins, Technical Releases, and Concepts

- There were no new standards, interpretations, technical bulletins, technical releases, or concepts issued during the period covered by this PSU.

### **Financial Accounting Standards Board (FASB)**

#### Accounting Standards Updates (ASU)

- FASB issues ASUs to communicate changes to the FASB Codification, including changes to nonauthoritative SEC content. To view details and the effective dates of ASUs, [click here](#).

### **Governmental Accounting Standards Board (GASB)**

#### Statements, Technical Bulletins, Implementation Guides, and Concepts Statements

- There were no new statements, technical bulletins, interpretations, implementation guides, or concepts statements issued during the period covered by this PSU.

## **C. REGULATORY GUIDANCE**

### **Office of Management and Budget (OMB)**

#### Circulars

- There were no relevant new or updated circulars issued during the period covered by this PSU.

#### Memoranda

- There were no relevant new or updated memoranda issued during the period covered by this PSU.

#### Bulletins

- There were no relevant bulletins issued during the period covered by this PSU.

### **Department of the Treasury**

#### Treasury Financial Manual (TFM)

- There were no relevant new or updates to the TFM issued during the period covered by this PSU.

#### TFM Bulletins

- [TFM, Bulletin No. 2025-04](#), *Change to Bulletin No. 2025-02, U.S. Standard General Ledger (USSGL) — A Treasury Financial Manual (TFM) Supplement* (March 20, 2025), notifies agencies that Part 1 (*Fiscal Year 2025 Reporting*) and Part 2 (*Fiscal Year 2026 Reporting*) of the USSGL Supplement have been revised. Part 1 requirements are effective immediately, and Part 2 requirements are effective October 1, 2025.

## **D. INTERNATIONAL AUDITING STANDARDS AND GUIDANCE**

### **International Auditing and Assurance Standards Board (IAASB)**

The IAASB sets international standards for auditing, quality management, review, other assurance, and related services and facilitates the convergence of international and national standards. To review recently issued IAASB pronouncements, [click here](#).

## **E. INTERNAL AUDIT GUIDANCE**

### **Institute of Internal Auditors (IIA)**

The International Professional Practices Framework (IPPF) is the conceptual framework that organizes authoritative guidance that the IIA promulgates regarding the practice of internal auditing. The IPPF includes the mandatory Global Internal Audit Standards and Topical Requirements, and supplemental Global Guidance. To access the IPPF, [click here](#).