

Why Good Audit Files Still Fail Inspection

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Most audit deficiencies identified during inspection are not caused by work that was never performed. They arise because the reasoning behind the work cannot be seen. There is a pattern in NFRA inspection findings that deserves more attention than it typically receives — the files that fail are rarely the ones where work was not done. They are the ones where work was done but thinking is not visible. This distinction matters enormously, because it means that effort alone does not protect you.

The Shift Regulators Have Made

For most of the profession's history, audit quality was evaluated through a straightforward question: was the work performed? Were confirmations sent? Were samples drawn? Were checklists completed? That question has not disappeared. But it is no longer sufficient on its own.

The question regulators are now asking is different: Was the judgement exercised with sufficient depth, scepticism, and clarity — under the specific circumstances that existed at the time of the audit? NFRA's inspection findings, across multiple years and multiple firms, reveal a consistent pattern. The central concern is not the absence of procedures. It is the absence of reasoning. And a well-maintained checklist does not answer it.

Two Narratives Inside Every Audit File

Every audit file contains two narratives. One is visible — the record of procedures: what was done, when it was done, what was obtained, and what was concluded. The other is not — the record of thinking: what the engagement team noticed, what they chose to question, what they accepted without sufficient challenge, and what they decided not to pursue further.

Regulators are increasingly reading the second narrative — not just the first.

Consider an entity whose receivable days increase from 90 to 180 days while revenue grows by 35%. The file may contain ageing reports, management explanations and collection schedules. Yet an inspector is likely to ask: what caused the auditor to conclude that the slowdown in collections did not indicate revenue recognition concerns?

A file that records management's explanation without evidence that the explanation was interrogated is not a file that demonstrates audit quality. It is a file that demonstrates compliance. There is a difference, and inspection findings expose it.

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Four Patterns That Appear Repeatedly

The specific patterns that appear repeatedly in NFRA findings are worth naming explicitly.

1 1. Shallow Rationale A note that says "the auditor is satisfied that the revenue recognition policy is appropriate" — without explaining what was tested, what alternatives were considered, and why satisfaction was reached — is assertion, not evidence of judgement.	2 2. Unexplored Inconsistencies An engagement team notices that revenue has increased sharply while collections have slowed, and the file records the observation but not the interrogation. The variance is explained. It is not examined.
3 3. Templated Language When the risk assessment language in year four of an engagement is substantively identical to year one, it reveals that the assessment was completed, not conducted.	4 4. Conclusions Disproportionate to Complexity A significant impairment judgement resolved in two paragraphs. A going concern assessment that occupies a single page for an entity under visible financial stress.

"None of these are dramatic failures. Each looks defensible in isolation. Under retrospective scrutiny, they form a pattern — and that pattern is what NFRA inspection reconstructs."

The Problem with Risk–Response Linkage

Of all the deficiencies that appear in inspection findings, the weakest point in most files is the connection between identified risk and designed response. Risk assessment is completed. A list of significant risks is documented. Audit procedures are performed. But the link between the two is missing or mechanical.

When an engagement team identifies revenue recognition as a significant risk because of complex multi-element arrangements and pressure to meet targets — and then performs standard substantive procedures without tailoring them to those specific drivers — the file reveals a gap. The engagement team recognised the symptom but failed to tailor its response to the underlying driver of risk.

This is what NFRA means when inspection findings refer to insufficient linkage between risk assessment and audit response. It is not a documentation complaint. It is a substance complaint dressed in documentation language.

What a File That Survives Scrutiny Looks Like

The distinction between a file that passes inspection and one that does not is not primarily about volume. It is about the visibility of reasoning. A file that survives scrutiny demonstrates four things:

A strong audit file does not merely show that procedures were completed. It shows how evidence influenced judgement, how contradictory information was evaluated, and why alternative explanations were rejected.

→ Understands the why, not just the what

The engagement team demonstrates that it understood why a particular area was risky — not just that it was risky.

→ Procedures designed for specific drivers

Audit procedures were designed in response to those specific risk drivers, not applied generically across the category.

→ Contradictory indicators explored

Contradictory indicators were explored rather than rationalised. The file shows the interrogation, not just the conclusion.

→ Judgements supported by reasoning

Significant judgements are supported by reasoning, not merely conclusion. Where management explanations were accepted, the basis for acceptance is explicit.

"The risk was identified. The response was not designed for the risk. It was designed for the category."

The Test Is Simple but Demanding

The old question was: Is the file complete? Were all procedures performed? Were all checklists signed off? Was the opinion issued on time?

The new question is: Does the file show how we thought? Can an inspector reconstruct the intellectual journey from evidence to conclusion? Is the reasoning behind every significant judgement visible, traceable, and proportionate to the complexity of the matter?

Audit quality today is no longer about performing the audit. It is about demonstrating that it has been performed well. That is not a semantic distinction. It changes what engagement partners must ask at every review stage.

The Practical Implication for Firms

The firms building NFRA-ready practices are making this shift at the level of engagement culture — not just documentation policy. Three changes are visible in firms that are ahead of this curve:

Document Reasoning, Not Just Conclusions

Teams are trained to record the intellectual process — what was considered, what was challenged, and why a particular conclusion was reached.

Review Processes That Test Depth

Review processes are built to test for depth of thinking, not merely procedural coverage. Partners ask whether the reasoning is visible, not just whether the work is done.

Risk–Response Linkage as a Standard

The connection between identified risk and designed response is treated as a substantive quality standard — not a documentation formality.

The File Is a Record of Judgement

The audit file is ultimately a record of judgement — not because it shows every procedure that was performed, but because it shows why the auditor believed the conclusion was justified. Procedures explain activity. Judgement explains quality. And increasingly, that is the difference regulators are evaluating. The firms that understand this distinction are not merely preparing for inspection. They are building a different standard of audit quality.

"Can a reader — an inspector reconstructing the engagement months or years later — follow the intellectual path from evidence to conclusion? If the answer is no, the file fails the standard that regulators are now applying."