International Practices Task Force DOCUMENT FOR DISCUSSION Monitoring Inflation in Certain Countries

November 10, 2020

The Center for Audit Quality (CAQ) SEC Regulations Committee and its International Practices Task Force (IPTF) periodically accumulates and discusses certain inflation data. This document represents the accumulation of information that was used to facilitate a discussion among IPTF members, but does not represent formal views or conclusions of the IPTF or its members. This document has not been considered and acted on by senior technical committees of the CAQ or the American Institute of CPAs (AICPA) and does not represent an official position of the CAQ or the AICPA. As with all other documents issued by the CAQ, this document is not considered authoritative and users are urged to refer directly to applicable authoritative pronouncements for the text of the technical literature. This document does not purport to be applicable or sufficient to the circumstances of any work performed by practitioners and is not intended to be a substitute for professional judgment applied by practitioners.

This document has not been considered or acted on by any accounting or regulatory bodies or their staff, including the Financial Accounting Standards Board (FASB) or the U.S. Securities and Exchange Commission (SEC), and does not represent a position of any accounting or regulatory bodies or their staff. Any entity wishing to request the formal views of the SEC staff regarding that entity's conclusions are encouraged to consult with the SEC staff.

As available on this website, these documents are not updated for the subsequent issuance of technical pronouncements or positions taken by the SEC or its staff, nor are they deleted when they are superseded by the issuance of subsequent documents for discussion or authoritative accounting or auditing literature. As a result, the information, commentary, or guidance contained herein may not be current or accurate and the CAQ is under no obligation to update such information. Readers are therefore urged to refer to current authoritative or source material.

Introduction

Registrants are responsible for monitoring inflation in countries in which they have operations. Under U.S. GAAP (ASC 830), the determination of a highly inflationary economy begins by calculating the cumulative inflation rate for the three-year period that precedes the beginning of the reporting period, including interim reporting periods. If that calculation results in a cumulative inflation rate in excess of 100%, the economy should be considered highly-inflationary in all instances. However, if that calculation results in the cumulative rate being less than 100%, historical inflation rate trends and other pertinent factors should be considered to determine whether such information suggests that classification of the economy as highly inflationary is appropriate. Registrants should be especially prudent when monitoring inflation data in countries where there is a concern about the reliability of the inflation data. Additionally, significant professional judgment is required when determining if there is sufficient evidence to conclude the country should no longer be classified as highly inflationary.

In an effort to facilitate greater consistency, the CAQ International Practices Task Force (the "Task Force") developed a framework for compiling inflation data to assist registrants in monitoring inflation statistics in connection with their determination of the inflationary status of countries in which they have operations. The information herein may be helpful to management in applying ASC 830, in conjunction with its internal controls over financial reporting to reach a conclusion on whether a country's economy should be considered highly-inflationary.

The Task Force compiled cumulative inflation data by country (for those countries for which the International Monetary Fund [IMF] publishes data), and then categorized the countries based on their cumulative inflation rates and the implementation guidance in ASC 830. (See the Appendix for a detailed description of how inflation rates are calculated.) In addition, the Task Force identified countries where projected cumulative inflation rates would have been categorized into categories considering the guidance in ASC 830 and in circumstances where there was not consistent reliable data.

The categories, the countries in each of the categories for this period, and reference to the page in this Document where inflation data is provided, are as follows:

1a. Countries with three-year cumulative inflation rates exceeding 100% (ASC 830, Case A)

Argentina	3
Iran	4
Lebanon	4
South Sudan	5
Sudan	5
Venezuela	5
Zimbabwe	5

- 1b. Countries with projected three-year cumulative inflation rates greater than 100% in the current year
 Suriname
 6
- Countries with three-year cumulative inflation rates exceeding 100% in recent years, but with three-year cumulative inflation rates between 70% and 100% in the last calendar year (ASC 830, Case B) None
- Countries with recent three-year cumulative inflation rates exceeding 100% after a spike in inflation in a discrete period (ASC 830, Case C) None
- 4. Countries with three-year cumulative inflation rates between 70% and 100% in the current year, or with a significant (25% or more) increase in inflation during the last calendar year, or a significant increase in projected inflation in the current year, or with projected three-year cumulative inflation rates greater than 100% in the next year

Angola	8
Haiti	8
Liberia	9
Yemen	9

There may be additional countries with three-year cumulative inflation rates exceeding 100% or that should be monitored which are not included in the below analysis because the sources used to compile this list do not include inflation data for all countries or current inflation data. One such country, for example, is Syria. Numerous other countries that are not members of the IMF are not included in the WEO Reports.

The data referred to herein is derived from the IMF World Economic Outlook Report Database – October 2020 ("IMF WEO Report"), unless otherwise indicated. The IMF WEO Report presents inflation data on a calendar year basis. Data presented in the IMF WEO Report as estimated is identified with an "*".

While the below data may be a useful resource for registrants, management should have adequate controls to independently verify and analyze any data on which they are basing a conclusion about an economy's highly inflationary status.

Below is a discussion of the countries included in each of the above categories.

1a. Countries with three-year cumulative inflation rates exceeding 100%

Case A in ASC 830-10-55-24 provides an example when the three-year cumulative rate exceeds 100% requiring a company to classify the economy as highly inflationary.

According to data obtained from the IMF WEO Report and other sources identified below, the following countries have three-year cumulative inflation rates exceeding 100%:

Argentina

	ACTUAL				PROJECTED		
Calendar year	2016	2017	2018	2019	2020	2021	
Annual inflation rate	N/A	25%	48%	54%	N/A	N/A	
Cumulative three-year rate				183%	N/A	N/A	

N/A = not available

Additional Information/Observations/Questions

The October 2020 IMF WEO Report did not provide any estimates for 2020 or 2021 so data published by the National Institute of Statistics and Census of Argentina (INDEC) below was considered to facilitate review of more updated data.

The three-year cumulative inflation rate presented below for the three years ended June 30, 2020 and September 30, 2020 was calculated based on monthly amounts from the National Consumer Price Index

(NCPI) published by the National Institute of Statistics and Census of Argentina (INDEC). The NCPI was reintroduced in June 2017; therefore, the cumulative three-year NCPI rate is as follows:

Actual Subsequent to 2019

(Source: National Institute of Statistics and Census of

	Argentina (IND	EC))
Calendar date	June 30, 2020	September 30, 2020
YTD NCPI inflation rate	16%	21%
Cumulative three-year rate	187%	193%

Iran

		AC	TUAL		PROJI	PROJECTED	
Calendar year	2016	2017	2018	2019	2020	2021	
Annual inflation	12%	8%	54%	26%	35%	25%	
Cumulative three-year rate				110%	162%	113%	

Note:

In the October 2020 WEO the IMF changed the 2018 annual inflation, and corresponding index at the end of 2018 and after, from the previously reported 48% to 54%. This resulted in an insignificant change in the 3-year cumulative rate but no change in category from the previously reported 101% to 110%.

Lebanon

		AC	TUAL	PROJECTED		
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	3%	5%	6%	7%	145%*	N/A
Cumulative three-year rate				19%	176%	N/A

Notes:

According to Trading Economics, Annual Inflation as of August 2020 is 120%.

*According to WEO October 2020 dataset, the data for Lebanon is last updated as of September 2020 – which projects a three-year cumulative inflation rate of 176% in the current year.

Actual Subsequent to 2019

(Source: Central Administration of Statistics, Lebanon)

Calendar date	March 31, 2020	June 30, 2020	September 30, 2020
YTD inflation rate	11%	79%	118%
Cumulative three-year rate	33%	114%	150%

South Sudan

		ACT	UAL	PROJECTED		
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation	480%	118%	40%	30%	20%	24%
Cumulative three-year rate				296%	119%	93%

Sudan

		ACTUAL				PROJECTED		
Calendar year	2016	2017	2018	2019	2020	2021		
Annual inflation rate	30%	25%	73%	57%	199%	103%		
Cumulative three-year rate				240%	712%	853%		
Cumulative three-year rate				240%	/12%			

Venezuela

		ACTUAL				PROJECTED	
Calendar year	2016	2017	2018	2019	2020	2021	
Annual inflation rate	274%	863%	130K%	9.5K%	6.5K%	6.5K%	
Cumulative three-year rate				121M%	832M%	42M%	

Zimbabwe

ACTUAL					PROJ	ECTED
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	-1%	3%	42%	521%	495%	3%
Cumulative three-year rate				813%	5.2K%	3.7K%

1b. Countries with projected three-year cumulative inflation rates greater than 100% in the current year

According to data obtained from the IMF WEO Report, the following country has a projected three-year cumulative inflation rate greater than 100% in the current year but has not yet exceeded 100% as of the most recent year-end and any subsequent comparable monthly data available as of the meeting date. Under ASC 830-10-45-12, an economy must be classified as highly inflationary when the cumulative three-year rate exceeds 100%. However, if that calculation results in the cumulative rate being less than 100%, historical inflation rate trends (increasing or decreasing) and other pertinent economic factors should be considered to determine whether such information suggests that classification of the economy as highly inflationary is appropriate sooner. ASC 830-10-45-13 states that the definition of a highly inflationary economy is necessarily an arbitrary decision requiring judgment and in some instances, the trend of inflation might be as important as the absolute rate.

Registrants should have appropriate controls in place to monitor more current reported inflation data and consider other pertinent economic indicators to determine if and when the following country should be considered highly inflationary:

Suriname

		ACTUA	PROJECTED			
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	52%	9%	5%	4%	105%	21%
Cumulative three-year rate			76%	20%	125%	158%

Actual Subsequent to 2019

(Source: National Bank of Suriname)

Calendar date	March 31, 2020	June 30, 2020	Sep 30, 2020
YTD inflation rates	14%	32%	44%
Cumulative three-year rate	33%	51%	61%

2. Countries with three-year cumulative inflation rates exceeding 100% in recent years, but with three-year cumulative inflation rates between 70% and 100% in the last calendar year

Case B in ASC 830-10-55-25 provides an illustrative example of a country where an economy continues to be classified as highly inflationary even though the three-year cumulative rate is below 100%

because there is no evidence to suggest that the drop below 100% is other than temporary and annual inflation has been high on a consistent basis.

Countries in this category should be monitored by management, who should apply judgment in determining when there is sufficient evidence to conclude the country should no longer be classified as highly inflationary.

There are no countries in this category.

3. Countries with recent three-year cumulative inflation rates exceeding 100% after a spike in inflation in a discrete period

Case C in ASC 830-10-55-26 provides an illustrative example where a country's economy no longer exceeds 100% for the cumulative three-year rate and the classification as highly inflationary resulted from an isolated spike in annual inflation. ASC 830-10-55-26 states that this country's economy should no longer be classified as highly inflationary.

According to data obtained from the IMF WEO Report, the following countries three-year cumulative inflation rates have exceeded 100% after a spike in inflation in a discrete period. Countries in this category should be monitored by management, who should apply judgment in determining when there is sufficient evidence to conclude whether the country should be, or should no longer be, classified as highly inflationary:

There are no countries in this category.

4. Countries with projected three-year cumulative inflation rates between 70% and 100% in the current year, or with a significant (25% or more) increase in inflation during the last calendar year, or a significant increase in projected inflation in the current year, or with projected three-year cumulative inflation rates greater than 100% in the next year

According to data obtained from the IMF WEO Report, the following countries have projected three-year cumulative inflation rates between 70% and 100% in the current year, or a significant (25% or more) increase in inflation during the last calendar year, or a significant increase in projected inflation in the current year, or projected three-year cumulative inflation rates greater than 100% in the next year.

Registrants should have appropriate controls in place to monitor more current reported inflation data and consider other pertinent economic indicators to determine if and when the following countries should be considered highly inflationary:

Angola

		ACT	PROJECTED			
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	41%	24%	19%	17%	22%	20%
Cumulative three-year rate			107%	71%	69%	71%

	Actual Subsequent to 2019 (Source: National Bank of Angola)					
Calendar date	March	June 30,	Sept 30,			
	31,	2020	2020			
YTD inflation rate	22%	23%	24%			
Cumulative three-year rate	70%	71%	73%			

Notes:

The projected 3-year cumulative rate at the end of 2020 is 69%, but the actual 3-year cumulative inflation rate as of September 30, 2020 is 73%.

Haiti - New in 2020

	ACTUAL			PROJECTED		
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	12%	15%	13%	20%	25%	22%
Cumulative three-year rate				56%	69%	82%

Liberia

	ACTUAL				PROJECTED	
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate Cumulative three-year rate	13%	14%	29%	20% 76%	11% 72%	8% 44%

Yemen

	ACTUAL				PROJECTED	
Calendar year	2016	2017	2018	2019	2020	2021
Annual inflation rate	12%	47%	14%	6%	45%	21%
Cumulative three-year rate				78%	76%	87%

Appendix: Description of how inflation rates are calculated

For all countries, data is extracted from the International Monetary Fund ("IMF") website. IMF data is extracted from <u>www.imf.org</u> as follows:

- On the home page, select the "Data" tab, and then click "World Economic Outlook Databases" link.
 - Select the most recent database (October 2020).
- Select "By Countries (country-level data)".
- Select "All Countries", then click the "continue" button.
- Under the "Monetary" subject header, select "Inflation", "end of period consumer prices" (both the index and percent change); then click the "continue" button.
- Select a date range (e.g., 2016-2020); click "prepare report" and a table is produced with the data; click the "download" link to export to excel. The data table includes the actual and estimated end of period price indices for each country.

The IMF World Economic Outlook (WEO) report estimates inflation when actual inflation data has not been obtained. The text of the report describes the assumptions and conventions used for the projections in the WEO. The data that are estimated are highlighted. While the IMF data has limitations (projected inflation data and varying dates through which actual data is included in the table), the calculated three-year cumulative inflation allows us to determine which country's calculations require further analysis.

Note: From time to time the WEO refines or updates previously reported actual Consumer Price Index (herein referred to as "Index" or "CPI") data for certain countries.

Using the downloaded table, the three-year cumulative inflation rate is calculated as follows (assuming the current year is end of year 2019): (2019 End of Year CPI – 2016 End of Year CPI) / 2016 End of Year CPI.

It should be noted that the IMF inflation data used to summarize inflation could be different from the inflation data reported by the respective countries' central banks or governments. The Task Force has not performed procedures to identify any potential differences. Accordingly, this summarized IMF information should be supplemented, to the extent considered necessary, with other pertinent information that may be available.

For registrants that need additional information to monitor inflation for operations in certain countries, it should be noted that annual or month-end CPI information can be obtained from some countries' central bank or government websites or other publicly available information but that data may differ from the inflation data reported by the IMF and may need to be converted because of differences in presentation or other reasons (for example, some countries have reset their base index back to 100 during recent years). While inflation data published by a central bank or government is often more current than the IMF data, each country releases its inflation data at different times and inflation data for some countries may not be otherwise publicly available.

About the Center for Audit Quality

The Center for Audit Quality is an autonomous public policy organization dedicated to enhancing investor confidence and public trust in the global capital markets. The CAQ fosters high-quality performance by public company auditors; convenes and collaborates with other stakeholders to advance the discussion of critical issues that require action and intervention; and advocates policies and standards that promote public company auditors' objectivity, effectiveness, and responsiveness to dynamic market conditions. Based in Washington, DC, the CAQ is affiliated with the American Institute of CPAs. For more information, visit www.thecaq.org