BACKGROUND NOTE ON ACTION PLANS

SMO Action Plans are developed by IFAC Members and Associates to demonstrate fulfillment of IFAC Statements of Membership Obligations (SMOs). SMOs require IFAC Members and Associates to support the adoption¹ and implementation² of international standards and other pronouncements issued by independent standard-setting boards under the auspices of IFAC as well as by the International Accounting Standards Board (IASB); and to establish a Quality Assurance (QA) review and Investigation and Disciplinary (I&D) systems.

IFAC Members and Associates conduct a self-assessment against the requirements of SMOs and identify areas where improvements are needed. Based on the results of the assessment, Members and Associates develop an SMO Action Plan to (a) demonstrate how they fulfill the requirements of the SMOs and (b) where some requirements are not yet addressed, to present plans towards their fulfillment.

SMO Action Plans are designed to be ever-green documents that provide a comprehensive description of the accountancy profession and its legislative and regulatory environment in the jurisdiction as well as the actions undertaken by IFAC Members or Associates to support adoption and implementation of international standards and best practices.

Regular updates of the SMO Action Plans are required as part of the IFAC Member Compliance Program.

Use of Information

Please refer to the *Disclaimer* published on the Compliance Program website.

ACTION PLAN

IFAC Member:	Institute of Management Accountants (IMA®)
Approved by Governing Body:	IMA Chief Financial Officer, November 3, 2014
Originally Published:	November 2014
Draft Update Submitted:	March 2018
Last Updated:	June 2018
Next Update:	June 2020

¹ Adoption is concerned with the decision that international standards are appropriate for use in specific national financial reporting environments and with the actions necessary to effect those decisions, including incorporation into national requirements or requiring the use of international standards through law. Adoption may include a process to review draft international standards, translation, public exposure of proposed standards, approval, incorporation into national requirements as necessary, and promulgation of final standards, and, where applicable, a convergence process to eliminate or minimize differences between international and national standards.

² Implementation may include a process to build awareness of the adopted standards, provide relevant education and training, develop or disseminate implementation guidance and any other activities that promote proper understanding and use of the standards in practice.

Glossary

ACCA	Association of Chartered Certified Accountants
CFO	Chief Financial Officer
CMA®	Certified Management Accountant
CPE	Continuing Professional Education
CSO	Content Specification Outlines
ECS	Education and Career Services
IAASB®	International Auditing and Assurance Standards Board
IASB	International Accounting Standards Board
	Institute of Certified Management Accountants
IESBA®	International Ethics Standards Board for Accountants
IFRSs	International Financial Reporting Standards
IMA®	Institute of Management Accountants
IPSAS[®]	International Public Sector Accounting Standards Board
ISAs	International Standards on Auditing
NASBA	National Association of State Boards of Accountancy
PCAOB	Public Company Accounting Oversight Board
SEC	Securities and Exchange Commission
US GAAP	United States Generally Accepted Accounting Principles

Action Plan Subject:SMO 1–Quality AssuranceAction Plan Objective:SMO 1–Quality AssuranceAction Plan Objective:As a non-audit organization, IMA promotes best practices to it members performing in audit roles and to those working with audit professionals.

Background

Management accountants certified by IMA's CMA[®] (Certified Management Accountant) credential perform management accounting work, outside of licensed audit duties. IMA understands the close relationship between management accountants and audit professionals and is committed to promoting best practices. IMA keeps its members and the profession at-large informed of current on-the-job issues and advocates on matters affecting management accountants. IMA leadership has deemed that the organization has no direct responsibility for SMO1, but is aware of its context in relationship with the audit side of the accounting profession. IMA leadership has concluded that quality assurance of the audit profession is best handled by other organizations. IMA supports the highest standards in the profession.

#	Start	Actions	Completion	Responsibility	Resource			
Improv	Date Date Improvements to Process							
1.	2014	New Content Specification Outlines for CMA exam developed, including subject matter covering financial accounting. CSO changes are made in response to ICMA's periodic Job Analysis Study	Next Job Analysis Study to be performed in 2018	Institute of Certified Management Accountants (ICMA)	Staff and ICMA Board of Regents			
Mainta	ining Ongoi	ng Processes						
2.	Ongoing	Support the development of professional skills through new research, publications content, and learning products	Ongoing	IMA Value Creation Team	Staff and vendor support			
3.	Ongoing	Developed Career Driver online assessment tool to assist IMA members with evaluation of knowledge, skills, and attitudes associated with a variety of common accounting job titles	Completed 2015; updates made on an ongoing basis	IMA ECS	Staff and vendor support			
4.	Ongoing	Inform IMA members of relevant IMA Advocacy efforts related to the client/auditor relationship. Encourage high standards among all stakeholders.	Ongoing	IMA Director of Technical Activities and IMA Director of Communications and PR	Staff			

5.	2016	Developed and released for public exposure the Management Accounting Competency Framework to define professional competencies in the management accounting profession	Published in 2017; updates under development in 2018	IMA ECS and Research & Policy Teams	Staff		
6.	Ongoing	Pursue partnerships with other organizations to understand and complement other sectors of the accounting profession. Partnerships focus around developing thought leadership, research, and advocacy	Ongoing	IMA Senior Leadership Team	Staff		
Review	Review of IMA's Compliance Information						
7.	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	Staff		

Action Plan Subject: SMO 2–International Education Standards for Professional Accountants and Other Pronouncements issued by the IAESB Action Plan Objective: Ensure that continuing education requirements for IMA's CMA-certified members remain in compliance with SMO2.

Background

To qualify as a CMA (Certified Management Accountant), an individual must earn a Bachelor degree from an accredited institution*, complete two years of work experience in management accounting or financial management, pass Part 1 and Part 2 of the CMA exam, and maintain 30 verifiable hours of annual continuing professional education (including a minimum of two hours in the area of ethics). Continuing professional education must pertain to the CMA's content domains or any NASBA domain. The annual continuing education requirement is enforced and maintained by the Institute of Certified Management Accountants (ICMA), the certification division of IMA. Members are reminded of this requirement during Q4 of each calendar year.

The majority of IMA's continuing education programs are developed in compliance with NASBA (National Association of State Boards of Accountancy) requirements. Continuing education programs are designed for the professional development of accountants and financial professionals in business, including members of IMA as well as other professionals. These programs include online self-study courses, free webinars, and national and local conferences and events.

* Note: IMA provides a list of accredited colleges/universities. Degrees from non-accredited institutions must be evaluated by an independent agency. IMA also has a voluntary Endorsement of Higher Education Program for colleges/universities. The Endorsement Program is actively promoted to encourage participation. Endorsed schools are evaluated by IMA's Council on Academic Relations to verify that the school's curriculum aligns with the content areas tested on the CMA exam.

IMA has reviewed the 2015 IES and agrees that it is thorough and covers the various aspects of continuing professional education for accounting and financial professionals. The continuing education requirements of IMA's CMA program are in compliance with SMO2.

#	Start Date	Actions	Completion Date	Responsibility	Resource		
Impl	Improvements to Process						
8.	2017	New Content Specification Outlines for CMA exam developed, including subject matter covering financial accounting. CSO changes are made in response to ICMA's periodic Job Analysis Study	Job Analysis Study to be conducted in 2018	Institute of Certified Management Accountants (ICMA)	Staff and ICMA Board of Regents		
9.	2014	New online internal controls continuing education course covering revenue recognition, in response to joint pronouncements by FASB and IASB	Completed June 2015	Vice President, Education and Career Services (ECS)	Staff and vendor support		

10.	2014	Increase IMA's ability to measure member utilization of CPE offerings; adjust offerings to meet member needs	Ongoing	Vice President, Education and Career Services (ECS)	Staff
11.	2014	Developed and introduced Career Driver, a new online self-assessment tool for career planning	Completed October 2015; updated on an ongoing basis	IMA ECS	Staff and vendor support
12.	2018	Incorporated measures related to member continuing education needs in alignment with IMA's Strategic Plan for FY '2019-2022	Completed February 2018; evaluated annually	IMA CFO	Staff
13.	2016	Developed and released for public exposure the Management Accounting Competency Framework to define professional competencies in the accounting profession	Published in 2017; update under development in 2018	IMA ECS and Research & Policy Teams	Staff
14.	Open	Participate in appropriate opportunities to provide input to IAESB on IES provisions. Collaborate to find specific examples of output-based measurement and a process for accepting non-verifiable CPD.	Open	ICMA Senior Vice President	Staff and volunteer support
Main	taining Ongo	ing Processes			
15.	Annual	Execute IMA's Strategic Planning process, including an Environmental Scan to determine the continuing education needs of members and the profession at- large, as well as the requirements of SMO2.	Completed March 2016	IMA Senior Leadership Team	Staff and vendor support
16.	Ongoing	Maintain cross-functional collaboration between members of IMA's Value Creation Team to develop new programs relevant to IMA's thought leadership and members' continuing education needs	Ongoing	IMA Value Creation Team	Staff
17.	Ongoing	Offer free IMA member webinars covering relevant management accounting topics. More than 50 CPE credits are available annually	Ongoing	Vice President, Education and Career Services (ECS)	Staff and vendor support
18.	Annual	Deliver relevant learning opportunities at IMA's Annual Conference & Exposition	June, annually	Vice President, Education and	Staff and Volunteer Conference Planning Committee

				Career Services (ECS)			
19.	Ongoing	Promote, maintain and develop IMA's Higher Education Endorsement Program to recognize colleges/universities that enable students to pursue the CMA credential. Work with schools that have contingent approval.	Ongoing	IMA Professor- in-Residence and Council on Academic Relations	Staff and volunteer support		
20.	Ongoing	Maintain records of CPE for all IMA members. Notify members of annual CPE requirements through IMA's various communications channels.	Ongoing	ICMA Senior Vice President	Staff		
21.	Ongoing	Through IMA's public relations initiative, inform the profession at-large about the importance of higher education and curriculum reform in accounting.	Ongoing	Senior Director, Communications and PR	Staff and vendor support		
Revi	Review of IMA's Compliance Information						
22.	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	Staff		

Action Plan Subject: SMO 3 – International Standards and other Pronouncements Issued by the IAASB Action Plan Objective: As a non-audit organization, IMA raises awareness about IAASB pronouncements to IMA audiences.

Background

Section 13 (a) (2) of the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002 requires listed entities to be audited. The auditing standards to be used in the performance of and reporting of the financial statements of listed entities are set by the Public Company Accounting Oversight Board (PCAOB) and approved by the Securities Exchange Commission (SEC). The PCAOB requires that auditors of US public companies be subject to external and independent oversight. Firms auditing listed entities are now required to be registered with the PCAOB and to adhere to all PACOB rules and standards in those audits.

By definition of the organization's mission, IMA members work in management accounting roles, distinct from audit duties. IMA's members often work with auditors, so it is important for them to understand the issues affecting their auditor counterparts. The relationship between IMA and the PCAOB has been evaluated and leadership has determined that IMA does not have direct responsibility for SMO3.

#	Start Date	Actions	Completion Date	Responsibility	Resource
Maint	taining Ongoi	ng Processes: Technical Committee Engagement			
23	Ongoing	Maintain operations of IMA's technical committees (e.g., Financial Reporting Committee, Small Business Financial Reporting Committee, Technology Solutions and Practices Committee, and Committee on Ethics). This includes the development of positions on relevant issues and responding to Exposure Drafts and comment opportunities in line with IMA's Vision and Mission.	Ongoing	IMA Vice President of Research and Policy	Staff and volunteer committees
24	Ongoing	Provide comment letters in response to IAASB Exposure Drafts as appropriate to IMA thought leadership	Ongoing	IMA Director of Technical Activities	Staff and volunteer committees
25	Ongoing	Maintain relations with standards setters and other organizations influencing the audit profession. Contribute IMA thought leadership, as appropriate	Ongoing	IMA Director of Technical Activities	Staff and volunteer committees
Maint	taining Ongoi	ing Processes: Communications			
26	Ongoing	Leverage IMA's public relations program to raise public awareness of professional issues in line with IMA's positions developed by its technical committees.	Ongoing	IMA Sr. Director of Communications and PR	Staff and vendor support
27	Ongoing	Deliver relevant thought leadership on technical matters through IMA's professional publications	Ongoing	IMA Vice President of	Staff and contributors

				Professional Publications	
Maint	aining Ongoi	ng Processes: Continuing Education		T ublications	
28	Ongoing	Offer continuing education opportunities related to IAASB issues through IMA webinars, courseware, and conferences	Ongoing	IMA Vice President of Education and Career Services	Staff and vendor support
Revie	w of IMA's C	ompliance Information			
29	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	IMA Staff

Action Plan Subject: SMO 4 – IESBA Code of Ethics for Professional Accountants Action Plan Objective: Ensure that IMA members are aware of and in compliance with IMA's Statement of Ethical Professional Practice and demonstrate the highest standards of ethical business conduct.

Background

The Statement of Ethical Professional Practice adopted by IMA comprises overarching ethical principles to which IMA members are required to adhere. IMA's Committee on Ethics released an update to IMA's Statement of Ethical Professional Practice, following evaluation and review of the ethics codes of other accounting organizations, the IESBA Code, and NOCLAR. IMA leadership contends that, as a whole, IMA Principles and other standards and guidance requirements are no less stringent than the IESBA Code's as required in the revised SMO 4. IMA periodically reviews its Statement of Ethical Professional Practice to ensure that it serves its intended purpose, and is no less stringent that the IESBA Code. IMA's Statement of Ethical Professional Practice is principles based and encourages the professional judgment of the professional accountant. This is distinct from the prescriptive nature of the IESBA Code.

IMA will periodically consider further convergence activities in relation to the IESBA Code. IMA will monitor new and revised pronouncements of the IESBA and participate in the public comment process, disseminating information to its members as appropriate.

#	Start Date	Actions	Completion Date	Responsibility	Resource			
Impro	Improvements to Process							
30	Ongoing	Periodic review of IMA's Statement of Ethical Professional Practice to align with on-the-job best practices and current best practices, including those included within IESBA's Ethics Code	Completed October 2016	IMA Committee on Ethics, Governance Committee, Global Board of Directors	Staff and volunteer committees			
31	2017	Implement updates to IMA's Statement of Ethical Professional Practice	Completed July 2017	IMA Committee on Ethics, Governance Committee, Global Board of Directors	Staff and volunteer committees			
32	2015	Established an ad-hoc Board Committee to evaluate IMA Global Core Values and assess applicability to IMA volunteer policies and IMA's Statement of Ethical Professional Practice	Completed June 2015	IMA Global Board Chair and Ad-hoc	Volunteer committee			

				Committee	
				Chair	
33	Ongoing	Periodic review and amendment to IMA Board Policy C-400 (Ethics Compliance Procedures)	Completed February 2016	IMA Committee on Ethics, Governance Committee, Global Board of Directors	Staff and volunteer committees
34	2013	Establish a whistleblower policy (Board Policy A302) for IMA staff and volunteer leaders	Completed 2013, reviewed annually	IMA Governance Committee	Staff and volunteer committees
35	Annually	Introduce online ethics continuing education courses, annually	September, annually. Completed 2017	Vice President, Education and Career Services (ECS)	Staff and vendor support
36	Ongoing	Maintain policies related to ethics CPE requirements for IMA's CMA-certified members	Ongoing	ICMA	Staff
Mainta	aining Ongoi	ng Processes			
37	Ongoing	Enforcement of IMA Statement of Ethical Professional Practice in compliance with Board Policy C-400	Ongoing	IMA Committee on Ethics	Staff and volunteer committees
38	Ongoing	Maintain operation of IMA's Committee on Ethics in alignment with Functional Charter	Ongoing	Chair, IMA Committee on Ethics and IMA Staff Liaison	Staff and volunteer committees
39	Ongoing	Maintain operation of IMA's Ethics Helpline to provide clarification on applying IMA's Statement of Ethical Professional Practice to ethical situations. The Helpline is also a vehicle for the public to report ethical violations by IMA members.	Ongoing	IMA Committee on Ethics	Staff, volunteer committee, and vendor support
40	Ongoing	Maintenance of IMA Ethics Center (within IMA's website)	Ongoing	Staff	Staff
41	Ongoing	Active participation in IESBA Exposure Draft calls, as appropriate to IMA's positions	Ongoing	IMA Committee on Ethics	Staff and volunteer committees

42	Annually	Execution of annual Carl Menconi Ethics Case Competition and IMA Ethics Case Competition (IMA Educational Case Journal)	Annually; Completed February 2018	IMA Committee on Ethics and IMA Professor-in- Residence	Staff and volunteer committees		
43	Ongoing	Development of ethics continuing education resources via NASBA-approved webinars and sessions at IMA's Annual Conference & Exposition	Ongoing	Vice President, Education and Career Services	Staff and vendor support		
44	Monthly	Continue to offer content related to ethics in IMA's professional publications	Monthly	Vice President, Professional Publications	Staff and contributors		
Revie	Review of IMA's Compliance Information						
45	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	Staff		

Action Plan Subject: SMO 5 – International Public Sector Accounting Standards and Other Pronouncements Issued by the IPSASB Action Plan Objective: As an accounting organization not specifically representing accountants working in public-sector roles, IMA supports SMO 5 in spirit

Background

In the U.S., different public sector accounting standards are superposed. Public sector accounting standards for the financial reporting for the federal and state government are different. The federal government, state departments, and government agencies use the Statements of Federal Financial Accounting Standards issued by the FASB. State Governments and Local government use the standards issued by the GASB.

While IMA members typically do not specifically work in public-sector roles, IMA's management accounting thought leadership principles are applicable to these professionals. The relationship between IMA and the development of public sector accounting standards has been evaluated and it is determined that IMA does not have direct responsibility to adopt and implement SMO5. IMA will consider stakeholder impacts of SMO5 in the future.

#	Start Date	Actions	Completion Date	Responsibility	Resource
Maint	taining Ongoi	ng Processes			
46	Ongoing	Continue to educate IMA members and the management accounting members at-large about IMA's positions on technical issues that broadly affect management accountants in all types of organizations (including public sector). Leverage member communications channels, IMA's professional publications, and external media outlets	Ongoing	Staff	Staff and contributors
47	Ongoing	Continue to deliver a variety of continuing education resources covering broad-based skills related to management accountants working in all types of organizations, including public and private-sector organizations.	Ongoing	IMA Vice President, Education and Career Services	Staff and vendor support
48	Ongoing	Through IMA's Diversity and Inclusion initiative, encourage diversity in IMA volunteer leadership roles, including participation by professionals working in the public sector.	Ongoing	IMA Global Board of Directors and Volunteer Leadership Committee	Staff and volunteer leaders
49	Ongoing	Maintain relationships with government entities with which IMA has partnerships related to CMA certification support to public sector employees	Ongoing	Staff	Staff

Revie	Review of IMA's Compliance Information						
50	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	IMA Staff		

Action Plan Subject: SMO 6 – Investigation and Discipline Action Plan Objective: Enforce and Maintain IMA's Ethics Compliance Procedures (Board Policy C-400) in alignment with SMO 6.

Background

IMA is responsible for establishing an investigative and disciplinary (I&D) system for its members and accordingly, has established Board Policy C-400 "Ethics Compliance Procedures." C-400 defines the governing process for disciplining members who are not in compliance with IMA's Statement of Ethical Professional Practice. IMA's Committee on Ethics has the responsibility of enforcing this policy to all members and those with past felony convictions who are seeking membership. IMA Board Policy C-400 pertains to all members as a condition of membership with IMA, and is periodically evaluated to ensure it is appropriate to its purpose. Following proper due diligence of C-400 procedures, IMA members in breach of IMA's Statement of Ethical Professional Practice are expelled from IMA membership and are disclosed publicly through IMA's professional publication, Strategic Finance (print and online). IMA periodically reviews C-400 and updates as necessary. IMA members can access C-400 on IMA's website. IMA's Statement of Ethical Professional Practice is publicly available on IMA's website.

vements to P	Process Process Periodic review and amendment to IMA Board Policy		IMA	
Ongoing	Periodic review and amendment to IMA Board Policy			
5 5	C-400 (Ethics Compliance Procedures). No changes made to this policy following review.	Review and amendment completed February 2018	Committee on Ethics, Governance Committee, Global Board of Directors	Staff and volunteer committees
ining Ongoii	ng Processes			
Ongoing	Maintain IMA Ethics Helpline as a resource to any professional to provide clarification on applying IMA's Statement of Ethical Professional Practice to on-the- job ethical situations. The Helpline is also a vehicle for the public to report ethical violations by IMA members.	Ongoing; internal procedures under revision February 2018	IMA Committee on Ethics	IMA Committee on Ethics and staff support
Ongoing	Annual member declaration of compliance with IMA's Statement of Ethical Professional Practice through membership application and dues renewal processes	Ongoing	Staff	Staff
	Ongoing	Iming Ongoing Processes Ongoing Maintain IMA Ethics Helpline as a resource to any professional to provide clarification on applying IMA's Statement of Ethical Professional Practice to on-the-job ethical situations. The Helpline is also a vehicle for the public to report ethical violations by IMA members. Ongoing Annual member declaration of compliance with IMA's Statement of Ethical Professional Practice through	Image to this policy following review.February 2018Image to this policy following review.OngoingImage to this policy following review.February 2018Image to this policy following review.Ongoing;Image to this policy following review.Image to this policy following rev	Image to this policy following review.February 2018Committee, Global Board of DirectorsIming Ongoing ProcessesMaintain IMA Ethics Helpline as a resource to any professional to provide clarification on applying IMA's Statement of Ethical Professional Practice to on-the- job ethical situations. The Helpline is also a vehicle for the public to report ethical violations by IMA members.Ongoing February 2018IMA Committee, Global Board of DirectorsOngoingAnnual member declaration of compliance with IMA's Statement of Ethical Professional Practice throughOngoingStaff

54		Continue to promote the importance of ethics through articles in IMA's professional publications and contributions to external outlets through IMA's public relations program	Ongoing	Staff	Staff and contributors
55	Ongoing	New online ethics continuing education course introduced	September, annually. Completed 2017	Staff	Staff and vendor support
56	Ongoing	Continue to develop ethics subject matter on CMA exam	Ongoing	ICMA	Staff and vendor support
57	Ongoing	Maintain CPE requirement in the area of ethics for IMA's CMA-certified members	Ongoing	ICMA	Staff and ICMA Board of Regents
Revie	w of IMA's C	ompliance Information			
58	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	IMA Staff

Main Requirements of SMO 6

	Requirements	Y	Ν	Partially	Comments
1. A	be of the System A system of investigation, discipline and appeals exists for the accountancy profession. The system is operational.	Yes			Per IMA Board Policy C-400
v	nformation about the types of misconduct which may bring about investigative actions s publicly available.	Yes			Per IMA's Statement of Ethical Professional Practice
Initiation of Proceedings 3. Both a "complaints-based" and an "information-based" approach are adopted.		Yes			
	ink with the results of QA reviews has been established.	Yes			Learnings from investigations are incorporated in IMA's internal QA processes.

Requirements	Y	N	Partially	Comments
Investigative Process5. A committee or similar body exists for performing investigations.	Yes			IMA's Committee on Ethics serves in this capacity.
 Members of a committee are independent of the subject of the investigation and other related parties. 	Yes			
 Disciplinary Process 7. A separate disciplinary committee/entity exists to make disciplinary decisions on referrals from the investigation committee. 	Yes			
8. Members of the committee/entity include professional accountants as well as non-accountants.		No		All members of IMA's Committee on Ethics are accountants.
9. The tribunal exhibits independence of the subject of the investigation and other related parties.	Yes			
 Sanctions 10. The disciplinary system allows imposing an extensive range of penalties. It is particularly important to include (a) loss of professional designation; (b) restriction and removal of practicing rights; and (c) exclusion from membership. 			Partially	IMA's disciplinary system allows for the loss of professional designation and exclusion from membership. IMA does not govern the practicing rights of auditors and public accountants, which are governed by state licenses.
Rights of Representation and Appeal11. A third appeals body exists which is separate from both the disciplinary committee and investigative committee.	Yes			

Requirements	Y	N	Partially	Comments
Administrative Processes 12. Timeframe targets for disposal of all cases are set.	Yes			
13. Tracking mechanisms to monitor progress in investigation and discipline and related procedures are established.	Yes			
14. Records of investigations and disciplinary processes are established.	Yes			
Public Interest Considerations				
15. Activities are supported to ensure that the public is aware that an investigative and disciplinary system exists in the jurisdiction.	Yes			
16. A process for the independent review of complaints on which there was no follow-up established.	Yes			
17. The results of the investigative and disciplinary proceedings are made available to the public.	Yes			Suspension or termination of IMA members is published in Strategic Finance.
Liaison with Outside Bodies				If the party filing the complaint does not agree with the decision
 There is an appropriate process for liaison with outside bodies on possible involvement in serious crimes and offences. 	Yes			by IMA's Committee on Ethics, the complaint may be escalated to IMA's Global Board of Directors.
Regular Review of Implementation and Effectiveness	Yes			

Requirements	Y	N	Partially	Comments
19. Regular review of implementation and effectiveness of the system are performed and corrective actions are implemented.				

Action Plan Subject: SMO 7–International Financial Reporting Standards and Other Pronouncements issued by the IASB Action Plan Objective: Comply with SMO7 though IMA's communications and professional advocacy initiatives.

Background

The Section 13 (a) of the Securities Exchange Act of 1934 and the Sarbanes- Oxley Act of 2002, Section 404 and 302, require the private sector and non-listed entities to prepare annual statutory financial statements following US GAAP. The SEC sets the financial accounting and reporting standards for publicly held companies and relies on the FASB to fulfil this responsibility. The FASB is working with the IASB on a convergence project with the goal of developing a global set of accounting standards.

IMA promotes the understanding of IFRS through its member communication channels and through its professional advocacy initiatives.

#	Start Date	Actions	Completion Date	Responsibility	Resource	
Maint	taining Ongoi	ng Processes				
59	Ongoing	Maintain activities of IMA's volunteer technical committees (e.g., Financial Reporting Committee, Small Business Financial and Regulatory Affairs Committee, Technology Solutions and Practices Committee, and Committee on Ethics) in alignment with Functional Charters	Ongoing	IMA Vice President of Research and Policy	Staff and volunteer committees	
60	Ongoing	Maintain IMA's relationships with FASB and IASB; respond via comment letters, as appropriate	Ongoing	IMA Director of Technical Activities	Staff and volunteer committees	
61	Ongoing	Monitor the developments of convergence and communicate these developments to IMA members and to the profession at-large through member communications, IMA's professional publications, and external public relations activities	Ongoing	IMA Technical Committees and staff support	Staff and volunteer committees	
62	Ongoing	Continue to deliver continuing professional education learning products related to IFRS (e.g., courseware, webinars, live learning sessions). IMA's CMA-certified members may select optional IFRS courseware as part of their annual CPE requirement. These products are available to professionals outside of IMA, as well.	Ongoing	IMA Vice President of Education and Career Services	Staff and vendor support	
63	Ongoing	Communicate information related the convergence of accounting standards through the Advocacy section of IMA's website	Ongoing	IMA Director of Technical Activities	Staff	

64	Ongoing	Maintain relations with FASB and provide constituent input on technical matters affecting IMA members	Ongoing; Annual meeting with FASB completed in February 2018	IMA Director of Technical Activities	Staff and volunteer committees
Revie	w of IMA's Co	ompliance Information			
65	Ongoing	Annual review of compliance of SMO by IMA internal review team. Notify IFAC Compliance team of any updates to plan	Annually	IMA internal review team	Staff



The Association of Accountants and Financial Professionals in Business

June 4, 2018

Mr. Manuel Arias Technical Manager, Quality and Membership International Federation of Accountants 529 Fifth Avenue New York, NY 10017 Via email: <u>ManuelArias@ifac.org</u>

Subject: Letter to Confirm Institutional Support for the SMO Action Plan

Dear Mr. Arias:

This letter is confirm that the leadership of IMA[®] (Institute of Management Accountants) has reviewed the information contained in the SMO Action Plan prepared by IMA as part of the IFAC Member Compliance Program and will provide institutional support for its implementation.

On behalf of the leadership of IMA, I endorse publication of the SMO Action Plan on the IFAC website in the interests of transparency and to demonstrate our commitment to enhancing the quality and credibility of the accountancy profession worldwide.

Sincerely,

Jeffrey C. Thomson

Jeff Thomson, CMA, CAE President and CEO