Detailed Analysis of Respondents' Comments on Consultation Paper

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I. General Statements of Support of Note

Respondent's Comment

ACCA
ACCA is very supportive of the work of the IAESB and welcomes the opportunity to contribute to its future strategy and priorities.

AICPA-PcEEC
We congratulate the IAESB on its good work in developing the IESs. We believe that the IES, in their current form, are comprehensive and provide clear guidance to member bodies.

BDO
In broad terms we welcome the approach adopted by the IAESB of focusing on the identification of trends in the accounting profession in order to determine the implications for accounting education.

CIMA
CIMA agrees with the IAESB’s vision to increase public confidence in the accounting profession by setting and maintaining principles-based standards that codify good practice in accounting education.

CIPFA
Firstly, however, CIPFA should like to place on record its continuing support for the work of the IAESB. This Board performs an extremely valuable function in setting, through its standards, what is effectively the oversight environment for not just PAOs, but everyone engaged in the initial and continuing professional development of professional accountants. This is particularly important in government and public sector finance, as more and more countries adopt International Public Sector Accounting Standards and pursue a wider financial management professionalization agenda.

Common Content
We agree that high quality international standards are essential for both the pre- and post-qualification education of professional accountants. Hence, we also support the work the Board has recently completed in revising its suite of International Education Standards (IESs).

Copenhagen Business School
We would like to acknowledge the positive thoughts on developing the IES recognized in the consultation paper on ‘Meeting Future Expectations of Professional Competence: A Consultation on the IAESBs future Strategy and Priorities’.
CPA Canada would like to thank the members of the IAESB for their significant efforts in considering the best way for the IAESB and IFAC to guide IFAC member bodies in developing sound education programs.

Overall we are supportive of the IAESB’s vision for the next five years and strategic priorities.

We believe that a strong global baseline of accounting education is important given the continued globalization of businesses and increasing mobility of accounting professionals. Therefore, we continue to believe that the International Education Standards (IESs) are critical in today's world.

As a general remark, we welcome the completion of the IESs revision project and we thank the IAESB for its outstanding work on this challenging task.

We are grateful for the fine work of the IAESB in establishing the current set of revised IESs.

In general, we support the establishment of high quality education standards that can raise the standards for professional competence and strengthen public confidence in the accountancy profession.

ICAEW supports the establishment of high quality standards in accountancy, and recognizes that the profession is undergoing significant changes such as the globalization of business and evolution in technology and as such accountancy education must evolve to meet those trends and remain relevant.

ICAEW is particularly focused on ensuring that the profession continues to serve the public interest. In this regard we, in principle, support global standards that can facilitate the raising of standards for professional competence. Clearly the quality of people in the profession is of critical importance and we believe that strengthened public confidence in the accountancy profession is of the highest priority.
ICAS

ICAS has been, and continues to be, supportive of the need for high quality standards in education and professional development. Where there is a proven need for new standards, or a material change required to existing standards, ICAS supports IAESB in its activities.

ICPAK

We note that this consultation comes following the completion of the IESs revision project and we thank the IAESB for the outstanding work on this challenging task.

IDW

The IDW fully accepts that high quality international standards are essential for both the pre- and post-qualification education of professional accountants. We also support the work the Board has recently completed in revising its suite of International Education Standards (IESs).

ISCA

We would like to commend IAESB’s efforts in its continuous review of the full suite of IESs for their relevance to the accounting profession which has been evolving. In general, we agree to the proposed strategic priorities of IAESB in: Enhancing existing IESs, potential new IESs, adoption and implementation support and advancing international debate. In addition, we agree with IAESB that the proposed activities to achieve these strategic priorities be prioritized over a 5 year period (2017 to 2021).

SAICA

SAICA supports the establishment of high quality standards in accountancy, and recognizes that the profession is undergoing significant changes such as the globalization of business and evolution in technology and as such accounting education must evolve to meet those trends and ensure that prospective accountants remain relevant through the competencies they acquire through their qualification process. Most importantly accountants who qualify must be lifelong learners enabling them to adapt and change to a rapidly changing environment.

SAICA is particularly focused on ensuring that the profession serves the public interest. In this regard we, in principle, support global standards that can facilitate the raising of standards for professional competence. Clearly the quality of people in the profession is of critical importance and we believe that strengthened public confidence in the accountancy profession is of the highest priority. SAICA has supported the IAESB through participation in the formal structures in the past.
First of all we would like to emphasize that we fully support the view of the IAESB and Chair Chris Austin that accounting education remains a fundamental pillar in improving the quality of reporting and auditing financial statements. It is therefore essential to strengthen the public trust and confidence in the quality of the work of professional accountants by enhancing further their competence and judgment.

II. **General Statements of Concern and Related Matters for Consideration**

**Respondent's Comment**

**AICPA-PcEEC**

We believe that the IES, in their current form, are comprehensive and provide clear guidance to member bodies. Therefore, we believe the IAESB should allow IFAC member bodies a period of time to implement the existing IESs before engaging in activities to enhance existing standards or develop new standards. Also, we believe that any material developed by the IAESB to support adoption and implementation of the IESs should be developed in response to issues, questions and comments from IFAC member bodies as they implement the IESs. While monitoring the implementation of the standards by member bodies, the IAESB will be able to also facilitate thought leadership on relevant issues and identify the need for possible future revisions to the standards. However, thought leadership and future revisions should be driven by the experiences of member bodies implementing the standards.

**CICPA**

As a whole, the IAESB’s Future Strategy and Priorities contains "Trends in the Accounting Profession and Implications for Accounting Education, IAESB’s Standard Setting Context, IAESB’s Vision for the Next Five Years and Strategic Priorities" and Initial Considerations like "Enhancing existing IESs, Potential new IESs, Adoption and implementation support, Advancing international debate", the content is summary, consistent with the practical requirements.

At the same time, the IAESB points out whose vision is to increase public confidence in the accounting profession by setting and maintaining principles-based standards that codify good practice in accounting education.

For the overall content, we have no different opinions.
We agree with the IAESB mentioned in the file that “the newly revised IES8 becoming effective on July 1st 2016”, we’ll translate the IES8 and research the measurement of the implementation to maintain and improve our CPA’s professional competence as well.

CIMA

CIMA agrees with the IAESB’s vision to increase public confidence in the accounting profession by setting and maintaining principles-based standards that codify good practice in accounting education. It is also felt that at this point in time, that the IESs in their current form, are comprehensive enough. It is felt that the IAESB should now allow enough time for all IFAC members to adopt and implement the standards, rather than enhancing existing standards, or developing new ones.

Common Content

The Common Content Project constitutes the single biggest group of IAESB stakeholders that implement its International Education Standards (IESs). We are also very pleased to report that we have recently completed implementing all of the revised IESs into our Common Content education requirements.

We agree that high quality international standards are essential for both the pre- and post-qualification education of professional accountants. Hence, we also support the work the Board has recently completed in revising its suite of International Education Standards (IESs).

However, the IAESB itself recognizes that time is needed for IFAC member bodies to implement revised IESs prior to evaluating whether the aims of the revised IESs are being achieved. We agree with this statement, and also agree that this should form the basis for the IAESB’s intention to set its strategy and priorities for a period of five years instead of a shorter period.

Furthermore, in view of the need for an implementation period, we do not believe that now is the appropriate time for the Board to be asking respondents to provide their views as to the need for enhancements. We suggest instead that the Board consider whether a thorough implementation monitoring exercise needs to be conducted to establish where those who have sought to apply its standards (i.e., IFAC member bodies responsible for professional education and CPD, and others, such as our Project) or have faced difficulties in complying with or understanding the standards. This
does not imply that the IAESB is the appropriate body to perform such an implementation monitoring: the IFAC Compliance Committee and PAO Committee (or a joint effort of these two committees) may be better placed to actually monitor implementation and report back to the IAESB. In this case, it would not be appropriate for the IAESB to duplicate these efforts: the IAESB should generally limit its role to standards setting. In this respect, the IFAC Compliance Committee and the PAO Committee would likely focus in providing support to those member bodies in need in developing nations, rather than focusing on those bodies that have little difficulty in implementing the new IESs.

Such implementation monitoring would provide a good basis to identify whether any enhancements in specific areas in the longer term are needed, and in particular to inform the Board as to how it could best consider aligning IES 7 to its other standards. For these reasons, we do not support the development of any new standards or the revision of existing standards for the short or medium term. In this context, the IAESB may need to consider reducing the intensity and scope of its operations until standards setting is needed in the longer term.

EYG

With the completion of the clarification project of the existing IESs, we believe that the Board should take a respite from further standard setting for a period of time to allow for implementation. The Board should then plan to perform a post-implementation review so as to determine what changes, if any, are required. As a result, we believe that further standard setting should not be part of the FSP.

FEE

As a general remark, we welcome the completion of the IESs revision project and we thank the IAESB for its outstanding work on this challenging task. However, we believe that the completion of the IAESB’s principal mission should have an impact on its overall mandate (see our letters dated 4 October 2013 and 7 November 2014).

The Federation recognizes the importance of education and will continue to engage in activities related to the skills of accountancy professionals. The Federation has recently pointed out the need to rethink the education of auditors and other assurance providers to ensure the right skillset for the future (Pursuing a strategic debate: The future of audit and assurance, January 2016).
At the outset we wish to make it clear that paramount in our considerations is public interest; what is best in the public interest in a world of increasing demands and limited resources.

We are grateful for the fine work of the IAESB in establishing the current set of revised IESs. These are fundamental. We are pleased that there have been representatives of our MBs contributing to this work. We are not however convinced that further significant work is necessary at present in enhancing these standards.

No standards are ever perfect. A case can always be made for revisions. The real issue, where resources are limited, is whether such work should take priority. We suggest a watching brief should be exercised over the current set of standards and further work only proposed where it is essential that an existing standard be revised, or a new standard developed, where such work is critical to developing Professional Accounting Associations (PAOs). The developed PAOs see the standards as minimal requirements. They are capable, in their own right, of ensuring that their education programs are maintained at the appropriately high standards. Standards for their members to be capable of fully implementing accounting, auditing and ethical standards at the level expected, in the public interest, in their respective jurisdictions.

In a world of limited resources we believe the primary emphasis needs to be on adoption and implementation; capacity building. In the Consultations Executive Summary the IAESB envisages four priority activities. We would submit that currently there is need for only one priority issue, supporting adoption and implementation of the IESs.

There would be consequential changes necessary for such a course to be efficiently and effectively implemented. The procedures and processes associated with public oversight would need revision. The Terms of Reference for the IAESB and its membership would also need revision. These should be addressed by the PIOB and IFAC. Whilst these revisions are being pursued we also believe there would be real benefit in considering going further and transferring responsibility for adoption to the Compliance Advisory Panel and implementation to the PAO Development Committee.

We note that over the past few years IAESB has devoted its resources to revising the entire suite of International Education Standards i.e. IESs 1-8 under the principle-based framework and a learning outcomes approach in
developing and assessing professional competence. We support the principle-based competence framework which takes into account the wide spectrum of varying degree of economic developments and different legal requirements in the jurisdictions amongst member bodies.

However, we would like to reiterate the concerns we expressed on our submissions on IES 8 which took the suite of IESs into new and difficult areas. We believe there will be significant difficulties in the implementation and, especially, the monitoring and enforcement of IES 8. The determination of competence is in practice highly judgmental. IES 8 provides a very thorough framework or checklist but is different from what we understand as professional standards.

We believe the priority for IAESB should be the adoption and implementation of the IESs rather than the development of new standards. Subject to our above comments on IES 8 we believe that the current standards are comprehensive and robust. IAESB should also ensure that its efforts in this respect are coordinated with the work of the Compliance Advisory Panel and the Professional Accounting Organizations Development Committee.

ICAEW

ICAEW is a significant contributor to the IAESB in terms of both funding and expertise. Two ICAEW members serve on the IAESB as Forum of Firms representatives and we also support the Common Content representative on the IAESB Consultative Advisory Group. We are an acknowledged thought leader in the development of professional accountancy development and work closely with fellow professional bodies in major capital markets through the Global Accounting Alliance. We also contribute to the development of professional accountancy qualifications in emerging economies through our capacity building work around the world.

Leading professional accountancy bodies can continue to work with the IAESB in the public interest, however, we recommend that any further publications issued by the IAESB should only be issued where it is absolutely necessary and come in the form of principles-based guidance rather than educational requirements. We further suggest that the responsibilities and work of the IAESB may need to be redefined.
The path of professional development

Standards set in Financial Reporting, Public Sector Accounting, Auditing and Assurance, and for the most part in Ethics, can be applied in a relatively short term through the next reporting cycle, and/or the audit, of organizations bound by such standards. The effect on published financial information, and of the quality of audit and assurance activities thereon, is able to be measured relatively quickly after a standard has been adopted. We do not believe this model is replicated in education and professional development.

IFAC, and not necessarily the IAESB, should be assessing through its compliance activity the implementation periods and review points for international education standard uptake before approving any short or possibly medium term strategy for change. In the international education landscape that we observe, we believe currently there is no evidence for making changes to the existing IES 1-7.

The path to qualification as a member of an IFAC body will generally take a minimum of 4 years and a maximum of 7 years depending on the educational background and environment. The move to an approach requiring learning outcomes in IES2-4 requires change through this continuum. Accordingly it will be at least 4 years beyond the date of adoption and possibly as much as 6 or 7 years before a member body and its education structure (universities, colleges, assessment system, experience record system etc.,) can fully conclude the effects of the changes brought about by the new standards.

We consider, therefore, that the standard setting role of the IAESB should in principle continue, but we cannot see any evidence set out in the consultation which justifies the continuance of a standard-setting Board to work on either minor long-term changes, or to drift into its secondary or tertiary objectives.

Adoption and implementation

The IAESB has confirmed its existing role as supporting the implementation of the newly revised IES’s (paragraph 22). We would question why this is considered a primary activity of a standard-setting board.
IFAC is set up to support its member bodies through a number of alternative channels. The Professional Accountancy Organization Development Committee (PAODC) has, as its first objective, the support of the establishment in strengthening of professional accountancy organizations in all countries of the world. It further advocates that it will work with the IFAC member body compliance program to respond to development needs in the most appropriate manner through accessing resources in the IFAC membership. These expert groupings supported by the IFAC Education Secretariat would, in our view, be a more effective use of IFAC resources. Implementation assistance should be focused through the PAODC rather than a standard setting board.

Further, when one considers the role of the IFAC member body compliance program it leads to a question of whether a standard setting board should be concerned to any significant degree with adoption. Adoption is a matter for the IFAC Compliance Advisory Panel (CAP) in its implementation of the IFAC member compliance program. IFAC’s member body compliance program has the capacity to gather appropriate data on the adoption of the existing IES, and in partnership with the PAODC should be able to identify the areas where assistance may be required. IFAC member bodies continue to offer their assistance to other IFAC member bodies through a number of channels and IFAC requires the capacity to facilitate and encourage this outside the constraints of the standard setting board.

It is our view that a natural end point has been reached to the IAESB’s activities.

ICPAK

It is important for the Board to first provide sufficient time for IFAC member bodies to implement fully the (recently) revised IESs, before assessing whether the aims of the revised IESs are being achieved. We suggest that rather than focus on developing new and amending existing IESs, the Board should prioritize implementation monitoring exercise to establish difficulties, IFAC member bodies face in complying with or understanding the standards, as it would provide a basis for the identification of the need, if any, for enhancements in specific areas in the longer future, and specifically inform the Board as to how it could best consider aligning IES 7 to its other standards.
IDW  These revisions now need to be acted upon.

In this context, we note that the IAESB itself has confirmed its recognition that time is needed for IFAC member bodies to implement fully the (recently) revised IESs, before assessing whether the aims of the revised IESs are being achieved. We agree with this statement, and also that it should form the basis for the IAESB’s intention to set its strategy and priorities for a period of five years instead of a shorter period, that might otherwise be appropriate. Furthermore, in view of the afore-mentioned need for a period of “digestion”, we do not believe that now is the appropriate point in time for the Board to be simply asking respondents to state their “feelings” as to the need for enhancements. We suggest instead the Board conduct a thorough implementation monitoring exercise to establish where those who have experience in applying its standards (i.e., IFAC member bodies responsible for professional education and CPD, and others) have faced difficulties in complying with or understanding the standards. This would provide a solid foundation for the identification of the need, if any, for enhancements in specific areas in the longer future, and in particular to inform the Board more fully as to how it could best consider aligning IES 7 to its other standards. For these reasons, we do not support the development of any new standards or the revision of existing standards for the short or medium term.

IFAC SMPC  The SMP Committee (the Committee) recognizes the importance of the establishment and maintenance of high-quality professional accountancy education standards and guidance. It supports the IFAC Board’s commitment to the goal of developing a set of Standards of Membership Obligations (SMOs) that provide clear benchmarks to current and potential IFAC member bodies and to assist them in ensuring high-quality performance by professional accountants. The Committee supports the promotion of the adoption and implementation of international standards as required by IFAC’s SMOs.

The global environment is changing rapidly and many of the trends identified will impact the profession and may have potential implications for the IAESB’s International Educations Standards (IESs) in the future. Businesses are evolving and innovating more quickly than ever before. The IFAC Strategic Plan for 2016-2018 Charting the Future of the Global Profession identified Information and Communications Technology (ICT) as one of the key future macro trends. For example, it is forecasted that there will be 25 billion devices connected by the end of 2020, or three for every person.
on the planet. In addition, McKinsey & Company research recently found that 45% of work activities could be automated using already demonstrated technology. The 2015 IFAC Global SMP Survey found that 72% of respondents viewed keeping up with technology to be a moderate, high or very high challenge and technology developments were the third highest environmental factor considered to have a potential impact on SMPs over the next five years, after regulatory environment and competition.

In addition to technology, there are many changes in the business environment (e.g. internationalization and rising complexity) and increasing demands by society (e.g. for non-financial information and integrated reporting). Professional accountants will need to maintain their relevance by equipping themselves to help clients and employers proactively manage the rapid change and innovation. Continuing professional development (CPD) is very important to ensure that accountants are able to respond to these developments.

IIRC

The accountancy profession has become a significant advocate for Integrated Reporting <IR>, both through IFAC (with which the IIRC enjoys a successful collaboration and Memorandum of Understanding) and many of its member bodies. Several of those bodies have already adopted <IR> within their core professional syllabuses. In addition, a number of IFAC member bodies and international accounting firms are members of the IIRC Council and advocate for its adoption.

We believe that <IR> offers considerable opportunities for professional accountants to enhance their strategic role and influence, expanding their potential to report on the value of the whole business and encourage stronger collaboration across the organization to cultivate integrated thinking. This in turn will strengthen the decision-making facility of boards and engagement with providers of financial capital. This is set out in a range of reports – for example, IFAC’s own report, Creating Value with Integrated Thinking, which sets out the role of the professional accountant in promoting integrated thinking in their organizations.

ISCA

We would like to highlight the importance of the principles-based approach of the IESs in such proposed revisions / additions as suggested in our comments below, to allow flexibility to member bodies in their adoption and implementation.
As we see more and more professional standards surrounding the accounting profession become increasingly internationalized, we recognize the crucial importance of the efforts to develop and implement the International Education Standards (IESs) that are designed to develop professionals who can appropriately apply and implement these international standards.

Thanks to the efforts of members of the IAESB, the IESs underwent significant revision to transform them into principles-based standards. Given these significant changes, we believe that ensuring appropriate adoption and implementation of these standards is the foremost importance to the IAESB going forward, and that we believe the IAESB should dedicate its activities to adoption and implementation support. In light of the optimum use of the limited resources of the IAESB, and how we can best achieve the appropriate adoption and implementation of the revised IESs, we believe that the IAESB should carefully consider whether enhancing existing standards or developing new IESs is really necessary at this point in time. Should the IAESB, as a result of its deliberations, decide to carry out activities other than adoption and implementation support, the rationale for such decision needs to be clearly articulated and the extent to which the IAESB executes such activities would require through deliberations.

Furthermore, in promoting the adoption and implementation of IESs, it would also be necessary to revisit the discussion on the most suitable structure and organization for the IAESB.

We support the consideration of how the IESs may be updated to keep pace with the changes in the profession. However, we caution against tackling individual specific areas or specialisations with additional Standards – given the pace of change, there is a risk that the volume of IESs will become unmanageable to either maintain or implement.

We highlight the underlying premise of Continuing Professional Development (CPD) – namely the responsibility of the professional accountant to maintain and develop competence to perform their role. The changing nature of their role does not change this requirement, and while we appreciate the efforts of the IAESB to support the understanding of those changing roles, consideration will be needed to avoid outcomes being too prescriptive and outdated before they are published.
We encourage a focus on:

• Broad implementation of the recently revised Standards, supporting those doing so with implementation guidance where demand is identified, and
• Evaluating the existing learning outcomes in the current suite of Standards to identify gaps relative to the known changes in the expected skill sets of the professional accountant, or the skill sets necessary to accommodate change.

We also encourage increased sharing and dialogue amongst impacted parties on the emerging issues for the education of professional accountants, including not only technical areas, but also learning trends, preferences and innovation. For example, encouraging member bodies and their accountants to engage in a dialogue about potential development opportunities and evaluation, as well as the evolving role of the professional accountant.

SAICA

Leading professional accountancy bodies can continue to work with the IAESB in the public interest, however, at the heart of our response we recommend that any further publications issued by the IAESB should only be issued where it is absolutely necessary and come in the form of principles-based guidance rather than educational requirements. We further suggest that the responsibilities and work of the IAESB may need to be redefined.

WPK

We appreciate that the IAESB recognizes that time is needed to allow IFAC member bodies to fully implement the revised IESs before assessing whether the aims of the revised IESs are being achieved. This is in our view a crucial point: Education takes time. The regular time period for qualifying as a professional accountant after general schooling may be seven years or even longer. It therefore seems advisable to monitor the implementation of the revised IESs for a certain period before deciding on enhancing the existing IESs or developing new ones. This monitoring should encompass potential difficulties in understanding or complying with the standards. The IAESB might then consider preparing material to support adoption and implementation of the IESs. It should be made clear that this supporting material is intended to help IFAC member bodies and is therefore non-authoritative by nature.

We encourage the IAESB to advance the international debate on relevant issues. The IAESB is the right place to discuss these issues on a global level. This will support mutual understanding of local and regional circumstances in accounting education.
III. Responses to Specific Questions

Question 1: What enhancements, if any, do you feel should be made to the existing International Education Standards?

**AAT**  
AAT feels that the standards might benefit from a review as an entire suite for clarity and consistency now that the overall approach to standard setting has been determined and each standard is more or less finalized.

Additionally enhancements could be made to increase the likelihood of adoption by those PAO’s who have not yet done so. Enhancements would therefore reflect and satisfy the reason for non-adoption i.e., increased clarity within the standard or provide implementation guidance and case study examples. However this relies on the reasons for non-adoption being clarified first, rather than any assumptions being made.

**ACCA**  
As noted in the consultation document, ACCA believes that time is needed to allow IFAC member bodies to implement fully the revised IESs before assessing whether the aims of the revised IESs are being achieved. At this stage, therefore, we do not believe that any enhancements should be planned. Rather, an IAESB priority post 2016 should be to undertake research into the adoption and implementation of the existing IESs, and from that work identify any enhancements, or adoption and implementation support, that may be necessary.

We note that IES7 can be viewed as an exception to this as it was redrafted rather than revised as part of the Clarity Project on the IESs. Please see Q2 for our views on IES7.

ACCA agrees that the dynamic impact of IT requires professional accountants to constantly upgrade their knowledge and skills. However, we believe that the existing IESs reflect this changing environment. Specifically, IES 2 includes learning outcomes on Information Technology including (h)(ii) Explain how information technology contributes to data analysis and decision making, and (h)(iii) Use information technology to support decision making through business analytics. Also IES 3 includes a learning outcome (d)(vi) Apply appropriate tools and technology to increase efficiency and effectiveness and improve decision
making. These learning outcomes appear to have been carefully drafted to be future-proofed as they are not referencing specific tools or technology, which rapidly become obsolete.

Both IES 2 and IES 3 also carry a requirement for IFAC member bodies to ‘regularly review and update professional accounting education programs that are designed to achieve the learning outcomes in this IES.’

ACCA does not support updating the existing IESs as we believe this area is already adequately addressed as demonstrated above. However, the competence area of IT may be suitable to produce an information paper or toolkit which demonstrates to IFAC member bodies how the Learning Outcomes within the IES can be translated into professional accounting education program content, based on today's IT environment.

ACCA does not support IAESB developing practical guidance for professional accountants in the area of IT. We do not see this as the role of the standard setter, firstly because we believe that the IAESB's pronouncements should be addressed to IFAC member bodies and secondly because any practical guidance should be around the design and delivery of effective IPD and CPD, which is the IAESBs area of expertise, rather than on specific competence areas.

AICPA-PCEEC  We believe that there are no enhancements needed at this time.

ANAN  The Association consider the existing international Education Standards adequate.

We are therefore not recommending any enhancements to the existing international Education Standards.

BDO  Overall

We agree with the IAESB’s assessment, as mentioned in paragraph 20 of the consultation paper, that as accounting practices continue to develop, especially with regard to information technology and its varying aspects, there is a need for increased competency within a range of areas.
We support a focus on the skills needed to work in an IT-oriented environment, including the ability to interpret data produced by IT systems. For all aspiring and professional accountants involved in the financial reporting supply chain, there needs to be a baseline level of professional competence when using IT as part of their regular responsibilities.

In our view, the learning outcomes should be reflective of the practicalities faced by aspiring and professional accountants in the workplace and made as future proof as possible. Given the fast-paced nature of how business is changing, how the accounting profession is evolving (across all service lines and roles), and the fact that standard-setting necessitates appropriate due process, we would suggest that further moves by the IAESB to providing just-in-time implementation support or items of a thought-leadership nature will be especially helpful to advance international debate, while also potentially identifying future areas for inclusion in the IESs.

IES 5, Initial Professional Development – Practical Experience

Paragraph 17 requires that “practical experience of aspiring professional accountants be conducted under the direction of a practical experience supervisor”. Although “practical experience supervisor” is defined in the Glossary of Terms (April 2015), the definition is limited and does not indicate the specific learning and development or professional competence needed to be considered for such a role. This guidance is very important from a public interest perspective and ties in to the need for aspiring professional accountants to have the necessary mentoring, performance reviews and on the job training in order to be able to perform their role, to develop new skills, and ultimately to become a professional accountant operating in the public interest.

Continuing Professional Development (CPD)

Of the 8 existing IESs, 1 relates to entry requirements, 5 relate to Initial Professional Development (IPD) and 2 relate to CPD. Given that professional accountants spend the majority of their professional careers in the CPD phase, we would welcome additional IESs in this area. For example, the IESs related to CPD frequently
refer to a "specialist"; however, the IESs contain limited guidance on what constitutes a "specialist". We believe that an additional IES that addresses what the learning and development requirements are in order to be considered a specialist and how a professional accountant would maintain such status would be helpful to the profession and also support the public interest by ensuring a base level of knowledge for those holding themselves out as such.

In addition, we note that IES 7 – Continuing Professional Development (redrafted) allows for 3 different options in regards to the achievement of CPD: an input based approach, an output based approach and a combined approach. This appears to be inconsistent with the revised IESs, which focus on aspiring and professional accountants demonstrating the achievement of the learning outcomes.

We would therefore be supportive of the IAESB’s intention to revise IES 7 to be consistent with the remainder of the suite of IESs.

**All Revised IESs**

Following the extensive IES revision project which the IAESB conducted from 2010 to 2015, and now that IES 8 (revised) becomes effective from July 1, 2016, we would encourage the IAESB to perform a post-implementation review of the revised IESs in order to determine potential:

- gaps or issues in existing revised IESs that may require additional implementation support, updated learning outcomes, new IESs, or other guidance and
- sources of good practice from existing IFAC member bodies that could be shared with other IFAC member bodies to help support implementation.

In determining any potential new IESs we would strongly urge the IAESB to adopt an evidence-based approach to this process. As part of its information gathering, the IAESB should consider having discussions with
regulatory groups (e.g., IFIAR, as well as further outreach activities with IFAC member bodies and regional bodies (e.g., FEE, CAPA etc.).

CIMA

CIMA considers that at present, there is no compelling reason to change, enhance or update any of the existing International Education Standards (IESs). There has been considerable change made over recent years, and it is felt that it would be best to allow member bodies to ensure adoption of the existing standards.

Where necessary, clarification of some of the existing IESs, may assist the promotion of adoption by some member bodies.

CIPFA

Please see our response to question 2, below.

Common Content

We are not aware of any compelling need to enhance the existing IESs at this time. Rather than asking this question specifically within its consultation on future strategy and priorities, we suggest the IAESB seek to have a thorough implementation monitoring exercise conducted to establish where those who have experience in applying its standards (i.e., IFAC member bodies responsible for professional education and CPD, and others, such as our Project) have faced difficulties in complying with or understanding the standards. It is likely that such an implementation monitoring exercise could be performed better by the IFAC Compliance and PAO Committees. These committees should focus on those member bodies in need – rather than those that have little difficulty in implementing the new IESs.

The results of implementation monitoring should then guide the Board in determining whether there is a need for additional clarification or changes to its current requirements in the longer term.
We note that the IAASB recently performed its own implementation monitoring of its suite of ISAs that were issued in 2008, which revealed issues the Board intends to address on a standard by standard basis. Such an exercise would be the most appropriate way to inform the Board as to its future work program in terms of the standards. We note that the IAASB commenced new standards setting initiatives based on this implementation monitoring in 2015 – that is, seven years after the issuance of the clarity ISAs. Given the fact that the educational pipeline after general schooling for professional accountants may be six years or often even more, it would be sensible to permit those implementing the standards some time before seeking to change the standards again.

On this basis, we would not support initiatives to develop new standards or revise existing standards at the present time. This may imply that the IAESB consider reducing the extent of its operation in short and medium term.

CPA Australia

CPA Australia believes that the existing standards provide a sound basis for the design, development and assessment of professional accounting education programs. As the breadth of roles undertaken by professional accountants continues to expand CPA Australia believes that the clarity of the standards would be enhanced through the provision of guidance documents to demonstrate the applicability of the standards across contemporary areas of practice.

CPA Canada

We do not believe that any enhancements should be made to the existing IESs. As the Board noted in its Executive Summary “time is needed to allow IFAC member bodies to implement fully the revised IESs before assessing whether the aims of the revised IESs are being achieved.” We believe that it is very important to give member bodies time to consider the effectiveness of the current IESs. Changing education standards takes significant time because of the number of players that are involved in professional education and we question, given IFAC’s limited resources, whether standard setting is the best focus for the IAESB (we return to this point in question 5 below). There needs to be a period of steady state to properly evaluate whether the aims of the revised IESs are being achieved.

Please see response of question 5 for additional information.
We would support consultation with IFAC member bodies to determine what implementation issues member bodies are experiencing as well as asking what approach for the IAESB going forward would be most useful. The information gained through that exercise should drive the IAESB agenda going forward.

**CPAPNG**

As a PAO, CPAPNG endeavours to comply with the IES as established by the IAESB. In doing so, we have come to realize the importance of accountants demonstrating strong skill sets and competency levels in IT. An IES developed to meet this requirements may be a way forward to address this need. In doing so, a PAO would know the requirements/resources/CPD workshops needs to achieve desired outcomes in the way of fully IT trained accountants.

**DTT**

We agree with paragraph 20, that IT developments are changing the expected role of professional accountants and their required competencies. Digitalization and analytics are becoming more and more important in our digitalized world and professional accountant recruitment strategies have already changed and will continue to evolve in the future.

We strongly support periodic review of the IESs to ensure they appropriately reflect the impact of technology developments on the accountant of the future, and remain relevant. We do though believe the current wording of the learning outcomes in the IESs is at an appropriately high level to reasonably future proof the standards.

In our view there would be greater benefit in providing additional guidance to support the IESs, rather than updating the standards or development of further standards. We recommend the board consider if there is sufficient guidance to assist those designing and developing curricula for IFAC member bodies in these dynamic and complex areas.

We note that paragraph 20 describes the possibility of developing “practical guidance for professional accountants”; our understanding is that the IAESB generally develops content addressed to IFAC member bodies as opposed to professional accountants themselves. Does this signify a change of direction by the Board to address guidance to professional accountants directly?
EAA

Reading through the existing IESs, here you can find some suggestions.

IES1: Entry Requirement to Professional Accounting Education Program. This standard discusses the fair educational entry requirements to professional accounting education programs in order to ‘protect the public interest through the setting and maintenance of high-quality standards’. The standard could reinforce the relevance and the importance of education, especially for people willing to start a career as professional accountants. Education and, in particular, university education, provides students not only with technical skills but also with the appropriate frame of mind, the necessary critical thinking and the proper ethical background to make rational accounting judgments. Especially the last qualities can hardly be provided only by the experience from the field. They are essential and, for sure, not less important than practical technical skills. In conclusion, entry requirements that would exclude the possibility to join the accounting profession without a proper education background, in our opinion, would enhance the role of accountants in serving the public interest.

IES2: Initial Professional Development (IPD) – Technical Competence. This standard lists the technical competences and their levels that accountants are expected to demonstrate at the end of their IPD. The requirement of an ‘intermediate’ level required for ‘Financial accounting and Reporting’ and ‘Audit and Assurance’ may not be sufficient. Indeed, also junior accountants should demonstrate and ‘advanced’ level for those competence areas, especially looking at how Table A of IES2 defines the ‘advanced’ level. Professional accountants, at all levels, make decisions about the appropriateness of accounting for transactions, select accounting/audit evidence and assess that evidence: thus an intermediate level, as defined by the table A mentioned above, seems to be too low for performing a proper job and, once again, serving the public interest.

IES3: Initial Professional Development (IPD) – Professional skills. This standard lists the personal skills and their levels that accountants are expected to demonstrate at the end of their IPD. The level for ‘Interpersonal and Communication’ could be set as ‘advanced’ since the end of the initial IPD. Especially in an accounting context that continuously evolves and becomes more and more complex, in many cases a proper job can only be done by teams rather than individuals. Thus, an advanced level of communication, teamwork and active listening is essential at all stages of an accounting career.
IES4: Initial Professional Development (IPD) – Professional values, ethics and attitude. This standard lists the professional values, ethics and attitude and their levels that accountants are expected to demonstrate at the end of their IPD. We do not think that is appropriate to prescribe a level lower than advanced for the following competence areas: ‘Ethical principles’ and ‘commitment to the public interest’. At the very root of well-known business scandals that damaged the reputation of the accounting profession worldwide there was the lack of an ethical dimension rather than technical weaknesses. For protecting accountants’ reputation and the public trust in the profession, accountants should have and demonstrate advanced levels of ethical standards and commitment to the public interest at all stages of their career. The role that education can play in regard of this has been already illustrated in the comments related to IES1: please make reference to them.

Other points related to the other IESs have been highlighted in replying to the next questions.

**EYG**

We believe the Board should allow the clarified IESs to be implemented for a period of time and then do a post-implementation review. We believe the results of a post-implementation review will provide direction for the type of guidance and related material needed by Member Bodies and drive new standards or enhancements, if any, to the existing IESs.

**FEE**

The Federation commends the IAESB for having accomplished its work as the standard setter for professional accounting education. The development and revision of IESs 1-8 has resulted in mature principles-based standards.

One of the benefits of principles-based standards like the IES is however that they do not require frequent amendments, because the principles would rather remain valid even if the environment should change.

Furthermore, the revised IESs only came into effect in the course of 2014/2015, so IFAC member bodies will still need time to make efforts regarding the implementation of the revised IESs. After the implementation, they
would need again time to assess whether it works well in practice and then they could share their experience with the IAESB.

Therefore, at this point in time we consider the existing IESs as sufficient and doubt that amendments could result in enhancements before adequate feedback from IFAC member bodies is available on how the transposed standards work in practice.

HKICPA

We do not believe any enhancements should be made to the existing International Education Standards at this stage given members bodies are currently engaged in the adoption and implementation of the IESs. Ample time should be allowed for a proper completion of the implementation stage and collection of feedback before undertaking a post-implementation review for any proposed revisions to the existing IESs.

ICAEW

Professional accountancy bodies are currently engaged in the adoption and implementation of the current suite of IESs. To make further enhancements at this stage when member bodies have not yet completed the process of implementation would be inadvisable.

One potential change, which would remove some of the pressure on the professional accountancy organisations (PAOs) would be to re-position IES 8 as a guidance document for firms rather than an educational requirement for professional accountancy organisations. Individual professional accountants and their firms are and should be responsible for the detail of their CPD programmes – and the PAOs only for the general policy terms. In its current consultation on “A Focus on Professional Scepticism, Quality Control And Group Audits”, the IAASB is considering whether to revise (International Standard on Quality Control) ISQC 1. Therefore the matters covered in IES 8 could be addressed in the IAASB pronouncements, for example in the application material in ISQC 1.

Furthermore, the existing IESs are (rightly) principles-based and, in this regard we are concerned that enhanced guidance for implementation risks countering this approach as the IESs could transition to rule-based education standards.
ICAG  
We believe that the current IESs are adequate and largely address the pertinent educational requirements of professional accountants. However, the role of the PAOs must be emphasized to promote changes in accountancy education in tertiary education and training of professional accountants. The linkage between academic/universities and PAOs must be pursued to bridge the gap to promote greater collaboration in curricula design, teaching, learning, examination and research.

ICAP  
IAESB has recently revised the whole set of IES along with the Framework. The current approach of learning outcome based professional development is already a challenging task and it would require significant time and effort on the part of IAESB to help effective implementation. Therefore, we do not suggest any further enhancement of existing IESs.

ICAS  
We do not believe there should be any enhancements to the existing International Educational standards. Member bodies in both developed, and developing nations should be given the time to have the existing IES fully adopted and implemented throughout the whole qualification structure before a review is undertaken.

We have seen no evidence for the IES being revised and cannot at this stage provide any support for this course of action.

ICPAK  
The development and revision of IESs 1-8 has resulted in principles-based standards, which do not require frequent amendments, because the principles would rather remain valid even if the environment should change. We also note that the revised IESs only came into effect in the course of 2014/2015 with IES 8 effective date yet to come. It would be premature to consider amendments since we are yet to fully implement these standards thus be able to identify gaps that need to be addressed.

Rather than asking this question specifically within its consultation on future strategy and priorities, we suggest the IAESB conduct a thorough implementation monitoring exercise to establish where those who have experience in applying its standards (i.e., IFAC member bodies responsible for professional education and CPD, and others) have faced difficulties in complying with or understanding the standards.
ICPAR

Professional skepticism cannot be taught hence in our view the only way to instill this to Engagement Partners is through publishing/communicating cases of Audit failure where if the Partner had employed professional skepticism would have treated an item differently.

ICPAU

We agree that revision can be made to IES 7 - Continuing Professional Development to ensure that it is better aligned with other IESs. It is also essential that there is sufficient linkage made between IES 7 and IES 8 - Professional Competence for Engagement Partners Responsible for Audits of Financial Statements (Revised).

We believe that linkage between IES 7 and IES 2-5 would enable aspiring professional accountants develop attitude and mindset for life-long learning and that this would enhance their skills as they advance in their professional careers.

IDW

At the present time, we are not aware of any compelling need to enhance the existing IESs. Rather than asking this question specifically within its consultation on future strategy and priorities, we suggest the IAESB conduct a thorough implementation monitoring exercise to establish where those who have experience in applying its standards (i.e., IFAC member bodies responsible for professional education and CPD, and others) have faced difficulties in complying with or understanding the standards.

The results should then guide the Board in determining whether there is a need for additional clarification or changes to its current requirements in the longer term.

We note that the IAASB recently performed its own implementation monitoring of its suite of ISAs that were issued in 2008, which revealed issues the Board intends to address on a standard by standard basis. Such an exercise would be the most appropriate way to inform the Board as to its future work program in terms of the standards. We note that the IAASB commenced new standards setting initiatives based on this implementation monitoring in 2015 – that is, seven years after the issuance of the clarity ISAs. Given the fact that the educational pipeline after general schooling for professional accountants may be six years or often even more,
it would be sensible to permit those implementing the standards some time before seeking to change the standards again.

On this basis, we would not support initiatives to develop new standards or revised existing standards at the present time.

IFAC SMPC

In order to establish a robust basis for any enhancement to the IESs, we recommend that the Board undertakes work to assess the current implementation of the existing IESs. This exercise may include obtaining information on specific challenges with the standards and evidence of current implementation difficulties. The results can be used to inform the Board’s future strategy and provide detail on which standards may need to be addressed. We recommend that the Board contacts the International Auditing and Assurance Standards Board (IAASB), as it completed its own implementation monitoring of the Clarified International Standards on Auditing (ISA) in July 2013 and should be able to provide some useful advice.

It is recognized that IFAC member bodies may have direct responsibility for the implementation of IESs, no responsibility, or shared responsibility with government, regulators, educational institutions or other appointed authorities. As a result the final competencies can be very different, even within the same jurisdiction, which may have implications for the IESs. It is acknowledged that this is a complex matter and different roles require different competence levels, but given professional accountants cross border mobility is greater, a more similar or consistent training system may help to improve the mutual recognition of qualifications.

Globalization, interconnectivity, technology and a changing regulatory environment are impacting the role of accountants. For example, recent research identifies an increase and diversification in the provision of business advisory services by SMPs. The evidence base suggests that “trust” is a crucial underpinning of the relationship between SMPs and SMEs. There is a greater need for “soft skills” and for accountants to have a high-level of people and communication skills, besides technical knowledge and professional values. The development of the former skills through education and CPD is critical and can be under-valued during an accountants training.
The International Integrated Reporting Council (IIRC) mission is to establish integrated reporting and thinking within mainstream business practice as the norm in the public and private sectors. Organizations are now focused on communicating how all their resources are creating value and thinking more holistically about their strategy and performance. There is an evolution in corporate reporting and a greater focus on non-financial information. One of the learning outcomes under Financial Accounting and Reporting in IES 2 Initial Professional Development – Technical Competence (2015) is “Interpret reports that include non-financial data, for example, sustainability reports and integrated reports”. As the demands for accountants are evolving, the IESs could include more emphasis on the skills to analyze non-financial information.

The Board could also give some consideration to enhancing the IESs with respect to specific training content for accountants in the public sector. IFAC’s Nexus 1 report, The Accountancy Profession, Behind the Numbers, found that 7.9% of IFAC PAO members are employed in the public sector and their role is increasingly important to society. The wording of many of the existing IES refer only to private-sector oriented accountants (e.g. accounting, law and reporting primarily related to business) and the IESs may need a stronger emphasis on the public sector, including how to address corruption.

IIRC

<IR> is currently positioned in IES 2 (a) (iv), with an emphasis on the interpretation of reports that include 'non-financial information'. Given the role of accountants in leading on Integrated Reporting, and the linkages to strategy and governance, we encourage the IAESB to describe <IR> more broadly in its competences for initial professional development.

The <IR> Competence Matrix highlights the linkages between strategy, governance and reporting. In the IIRC’s matrix, competence areas have been introduced on integrated thinking, with learning outcomes related to strategy and governance. This includes the ability to explain and apply the fundamental concepts of value creation, the range of capitals used and affected by the organization, and the value creation process. These are concepts which go beyond financial reporting and will require a broader integration of performance metrics into internal decision-making and reporting. They are all areas where the professional accountant can take a
leading role within the organization. The competences around this might be more fully embedded within the standards for initial professional development.

**INCP**

Se debe hacer mucho más énfasis en el Juicio Profesional y abordar una metodología de referencia acorde a las necesidades globales en la elaboración, revisión y auditoría de estados financieros.

El juicio profesional (como una competencia en el contador) es un tema que debe ser abarcado constantemente en la profesión contable debido a las consideraciones y decisiones que el contador debe asumir en el desarrollo de su profesión. Realizar juicios puede ser todo un reto y no necesariamente existe una respuesta correcta.

Si bien el juicio profesional es algo que con la experiencia se adquiere, una metodología bien elaborada y actualizada podrá dar los lineamientos a ser considerados cuando el juicio profesional aún no es la habilidad del que aspira ser contador, el que es nuevo en la profesión (o poca experiencia) o aquel que siendo experimentado necesita soportar la decisión o el enfoque adoptado.

Debería hacerse referencia a una metodología basada en las mejores prácticas de la profesión contable al momento de emplear el juicio profesional en la elaboración, revisión y auditoría de los estados financieros. Si bien IES 8, dice que los miembros de IFAC deben establecer un marco de referencia de educación para el ejercicio del juicio profesional, se debe como tal construir uno por parte del IFAC con el propósito de que el liderazgo sea propiamente del IFAC en las mejores prácticas que sus miembros deben seguir o al menos tomar como referencia y adicionalmente de buscar ayuda cuando se identifican situaciones en las cuales deben basarse en el juicio profesional de otros.

**English Translation**

You must make much more emphasis on the professional judgement and deal with a methodology of reference global needs in the preparation, review and audit of financial statements.
Professional judgment (such as competition on the counter) is an issue that must be constantly covered in the accounting profession because of considerations and decisions that the timer should assume in the development of their profession. Judgments can be a challenge and there is not necessarily a correct answer.

While the professional judgment is something that the experience is acquired, a methodology well elaborated and updated you can give guidelines to be considered when professional judgment is not yet the ability of which aims to be counter, which is new to the profession (or inexperienced) or that being experienced need to support the decision or the approach taken.

There should be a reference to a methodology based on the best practices of the accounting profession at the time of use professional judgment in the preparation, review and audit of the financial statements. Although IES 8, says that members of IFAC must establish a framework of education for the exercise of professional judgment, you should be as such built one by the IFAC so leadership is itself the IFAC in the best practices that members must follow or at least take as reference and in addition to seek help when identify situations in which must be based on the professional judgment of others.

We are in full support of the principles-based approach which has enhanced clarity and consistency in the existing IESs, and allowed high flexibility for member bodies to develop professional accounting and continuing professional development programs that meet the diverse local and stakeholder needs, while maintaining focus on the core competence areas that all professional and aspiring accountants need to acquire.

As IAESB has shared in the Consultation Paper, one of its strategic priorities includes the enhancements to existing IESs. Please see our comments on the actions proposed by IAESB to address this strategic priority below:

- Paragraph 17: “...The IAESB has therefore established a task force to consider how best to revise IES 7 to enable professional accountants, through CPD, to meet the professional competence expectations required in the public interest.”

See responses to Questions 2 and 3 for additional information.
As shared in the Consultation Paper, the redrafted IES 7 does not align well with the output and outcomes approach (which is the focus of other newly revised IESs in development of professional competence). In addition, we agree with IAESB's perspective that there should be a “stronger focus on Continuing Professional Development (CPD)” in the suite of IESs considering that “professional accountants will spend the majority of their professional careers in the CPD phase.” It is therefore necessary to review IES 7 such that there is a more cohesive linkage between IPD and CPD. We also suggest that IAESB consider the inclusion of CPD guidelines aimed at individual sets of competences, for specific job roles at different levels and different specializations.

In the local context, the Singapore government has rolled out an initiative that brings together employers, unions, education and training providers, trade associations and the government, to project future skills needs and set out a systematic plan to develop those skills in the local workforce. One of the objectives of the initiative is to articulate and develop clear career progression pathways that will set out the key competencies and skills needed to progress at each stage of the individual's career. These progression pathways will be closely integrated with education, training and development, to ensure greater fluidity between learning and working as the individual progresses in his or her career.

For details of suggestions on how IAESB can align the requirements of IES 7 to support the learning outcomes approach of other IESs, please refer to our comments for Question 2.

• Paragraph 18: “...The IAESB is evaluating what actions it should take to support the development, maintenance, and demonstration of professional skepticism and professional judgment for professional accountants. Potential actions include reviewing existing references to these competences in the IESs or expanding references to these topics in existing or new IESs.”

Paragraph 19: “...a joint Working Group has been formed with representatives from these three independent standard-setting boards (SSBs) to make recommendations to each SSB whether there is standard-setting or related work that can be undertaken. The IAESB will continue to be guided in its approach to professional skepticism and professional judgment by the work of this joint Working Group, as well as the feedback on this consultation.”
We commend IAESB’s efforts in its participation in the joint Working Group for a holistic approach towards addressing the growing importance of the competence areas of professional skepticism and professional judgment. IAESB may consider including appropriate references from other applicable standards to IES 4, IPD- Professional Values, Ethics and Attitudes (2015), so as to increase awareness for the legal / moral obligations for professional accountants. However, to ensure clarity, we do not suggest the duplication of these standards in the revised IESs.

For details of suggestions on actions that IAESB can take to improve professional competence related to the appropriate exercise of professional skepticism and professional judgment, please refer to our comments for Question 3.

• Paragraph 20: “As accounting practices have developed, the dynamic impact of IT requires different competences among professional accountants. Additionally, the growing impact of aspects of IT such as data analytics, automated and tagged financial reporting, data security, and cloud-based accounting environments means that professional accountants are increasingly required to research, mine, and interpret such data, rather than just prepare it… The IAESB proposes updating existing IESs to reflect this and to develop practical guidance for professional accountants.”

We agree that the current competence statements relating to aspects of IT could be enhanced to reflect the prevalent use of new information technology tools to complement existing accounting software for transactions recording, financial statements preparation and consolidation, for increased value, productivity and data security to businesses.

However, practical guidance issued by IAESB will be very useful for member bodies to develop relevant CPD courses to address the evolving role of professional accountants due to new information technology tools.

JICPA

Since the priority should be on promoting the adoption and implementation of the revised IESs, it would require careful deliberations by the IAESB as to whether or not it is necessary to expand the existing IESs.
The enhancements to the existing International Education Standards (IESs) that would be considered by the board are:

1. The need for further Guidance Paper on IES 1 and IES 8.
2. The Guidance Paper on Learning Outcomes to be enhanced to include how output based approach could be used to measure learning outcomes during CPD. Currently, there is use of CPD hours which has been considered an input based system and not very effective in measuring achievement of learning outcomes.
3. IES 2 on content of professional accountancy programmes to be reviewed to include the following areas:
   - Public Sector Accounting Standards
   - Governance
4. The testing of the achievement of communication skills and ethics should be reviewed based on a learning outcomes approach.
5. Guidance on mentorship by mentors and practical experience log for trainees under IES 5.
6. Future projects to include:
   - Interpretation of the IESs to French, Spanish

We support the proposal to address compatibility of IES 7 and IES 8. Further specifics are captured in our response to question 2.

In addition we encourage the evaluation of the existing learning outcomes in the current suite of Standards, assessing whether:
- There is a need for a focus on skills such as the ability to adapt to and accommodate change, irrespective of its nature; and
- The learning outcomes in the IESs are sufficiently broad to capture the expected skill sets in the changing profession. Identified gaps may need to be filled with additional learning outcomes and
evaluated whether additional standards are needed. In addition, information papers may suffice in certain instances to articulate the relevance of the learning outcome in specific circumstances.

We encourage and recommend that any work undertaken should be done using existing research or studies, and through ongoing connectivity with those leading the change agenda.

SAICA

Member bodies are currently engaged in the adoption and implementation of the IESs. We submit therefore that to make further enhancements when member bodies have not yet completed the process of implementation would be inadvisable. We find therefore no compelling reason to enhance the existing IES's.

We believe that before making any changes to the IES's that full and detailed monitoring of the compliance to these standards be carried out and evaluated for IFAC's member bodies. It would be useful through this exercise to establish that all member bodies have a common understanding of the reviewed principle based standards, including the learning outcomes set out in the IES's, and to identify areas where member bodies are experiencing difficulties in applying these standards. This should assist the IAESB in establishing whether there is a need for additional or further changes.

It is likely that further implementation guidance would be far more useful that revising the actual standards themselves. Care should however be taken in developing further implementation guidance not to reverse back to a “rule-based” approach to the revised education standards.

If anything the IAESB should prepare guidance (share best practices) on how to ensure that focus is placed on the acquisition of skills through a variety of innovative teaching and learning approaches, as this is likely to serve accountant of the future better than simply learning lists of knowledge. Most critical of these skills is how to become a lifelong learner.

WPK

We are not aware of any deficiencies in the existing IESs. Enhancements do not seem to be necessary.
Question 2: How can the IAESB align the requirements of IES 7, Continuing Professional Development (2014) to support the learning outcomes approach of the other IESs, including IES 8, Professional Competence for Engagement Partners Responsible for Audits of Financial Statements (Revised)?

AAT
Other than a full revision of the standard to adopt a learning outcomes based approach it will be interesting to see the suggestions of the established task force.

ACCA
We believe it is sensible for the IAESB to revisit IES 7 in light of the other revisions which have taken place. The output and combination approaches in IES 8 do lend themselves well to the learning outcomes approach adopted in IES 2, 3, 4 and 8. And IES 7 already includes the assessment of learning outcomes achieved as one of the examples of verifiable evidence for the output-based approach. However, ACCA recognizes the potential conflict presented by IES 7, which also allows input measures, and IES 8 which is based on an output and outcomes approach. As part of any potential changes, we would draw the attention of the board to the issue that the existing IES 7 adopts the same approach to measurement of CPD as the revised IES 5 does for practical experience e.g., output-based, input-based and combination approaches. This relationship should also be considered as part of any revisiting of IES 7.

AICPA-PCEEC
We believe there is no need to align the requirements of IES 7 to support the learning outcomes approach of the other IESs at this time.

We support a learning outcomes approach for Initial Professional Development as expressed in IES 1 through 4. We agree that there is a body of foundational knowledge, skills and abilities (KSAs) that all aspiring professional accountants should attain. The outcomes articulated in IESs 1 through 4 are thorough and reflect the careful consideration and thought leadership exercised by the IAESB when drafting the standards. We also recognize that professional accountants build on these foundational KSAs to develop sometimes very narrow areas of expertise. The IAESB recognizes that professional accountants operate in an environment that is continuously changing and their areas of expertise therefore evolve rapidly. We do not believe it would be a productive use its resources for the IAESB to develop learning outcomes for Continuing Professional
Development in areas of expertise practiced by professional accountants. Nor do we believe that, given the nature of standard setting, such learning outcomes could be developed on a timely basis.

We also note that IES 5 recognizes the variety of roles played by professional accountants in allowing IFAC member bodies to adapt their practical experience requirements. The choice of using input-based, output-based or combination approaches to measuring continuing professional development (CPD) under IES 7 are appropriately aligned with the requirements of IES 5.

ANAN
ANAN believes that IAESB can align the requirements of IES 7 to support the learning outcomes approach of other IESs by encouraging PAOs to urge members to demonstrate professional competence necessary in their various fields and provide high quality services in order to strengthen the public trust in the profession.

BDO
As noted in all our previous responses to the IAESB, we are supportive of a revision of IES 7. The input-based approach outlined in IES 7 is not well aligned with the requirements of IES 8 (revised), which focuses on demonstration of the achievement of the learning outcomes for those professional accountants performing the role of an Engagement Partner. The existing IES 7 also does not build upon the IPD IESs (2-4) with their focus on a learning outcomes approach.

As noted in IES 7, one of the limitations of the input-based approach is that is does not directly measure the learning outcomes or professional competence developed through CPD, instead focusing on the number of hours a professional accountant has spent undertaking CPD. Problems may arise under this approach where:

- although an individual may be physically present at a learning event, he or she were not engaged in the learning and, as such, the learning outcomes were not achieved,
- the CPD completed may not be relevant to an individual's role, or
- the content was pitched at an inappropriate level of complexity and detail for the individual's role.

See response of Question 1 for additional information
In order to be consistent with the other revised IESs, we believe that IES 7 should not allow for a solely input-based approach to CPD; in that regard, we see the benefits of the combined approach and an output based approach.

We also suggest that during the revision of IES 7 the IAESB consider how appropriate CPD can be identified, monitored and measured during this new technological age. The IAESB will need to be careful not to focus solely on process (i.e. output versus input methods) but also to recognize the variety of forms of CPD available to professional accountants.

Professional accountants complete learning and development to develop and maintain their professional competence using a variety of means (formal learning, on the job learning, mentoring, webinars, use of videos and online technology). Any revised IES 7 should allow for:

- flexibility to address different IFAC member body jurisdictions and regulatory requirements and
- an emphasis that CPD is not solely formal learning (using the metric of hours spent in a classroom) to determine competency.

The IAESB has correctly identified the importance of professional competence as being core to the success of learning and development at the IPD stage of an aspiring professional accountant's career. We have been supportive of this approach and we would ask that the IAESB continue to emphasize this approach to demonstrating the achievement of learning outcomes as part of the CPD phase of an individual's career and lifelong learning.

CIMA There is an argument to be had that the IAESB should align the requirements of IES 7, Continuing Professional Development, to take an output and outcomes approach to CPD.
CIMA has recently mapped all of its paid for and free content from both CIMA and the AICPA to the recently-developed CGMA Competency Framework (http://www.cgma.org/Resources/Tools/DownloadableDocuments/competency-framework-complete.pdf).

This has driven the development of a CGMA member website – Competency and Learning website (https://competency.cgma.org/widgets).

The website enables members to undertake an assessment of their competency against a comprehensive range of skills covered by the CGMA Competency Framework. Based on the result of the assessment taken, members are then directed to appropriate learning activities (both free and paid for) for skills that they need to develop or acquire. The learning activities are organized by relevant competency and by skill level (foundational, intermediary, advanced and expert). The website also allows members to plan their annual CPD, keep records, evidence and reflection of activity, as well as submit their record electronically.

However, it is felt that any change to this now would place extra burden on a number of bodies, who are already addressing changes in other IESs. Also, the work of professional accountants (representing their various professional bodies) is very diverse. It is hoped that the individual bodies, their members, and their members’ employers, are in the best position to identify and recommend the most appropriate CPD for individual members.

CIPFA

At one level, the early release of the redrafted IES7 in 2014, out of cycle with the suite of revised standards, has created a significant conformance gap in terminology and approach between IES7 and the other IESs as they are issued. One response to this anomaly would be to undertake a further redrafting of IES7. However, CIPFA believes that this would be insufficient to align IES7 fully with the other IESs. Therefore, we ask that a full revision process of IES7 be undertaken, not just to meet conformance requirements with the Framework and Glossary, but to produce a CPD standard that embraces the learning outcomes approach of the other IESs.
CPAPNG

The requirements and objective of the other IESs can be delivered/achieved through a sound/robust CPD system in place. For example, IES 2, Technical Competence requirements can be measured by way of conducting CPDs in which illustration exercises can be done and collected by PAOs for competency level assessment.

CPA Australia

CPA Australia does not believe it is appropriate to apply a prescriptive learning outcomes approach to the scope of IES 7, Continuing Professional Development. The increased broadening of the scope of practice of professional accountants has created an environment where professional development needs have expanded beyond the traditional areas of accounting and now incorporate diverse areas both within, and outside of, the areas of business in which they traditionally sat.

In order to assist members in planning and undertaking their professional development CPA Australia provides a self-assessment tool which assists members to identify their level of competence against prescribed areas of practice. This assists members in identifying appropriate professional development activities to achieve their desired career goals.

We are also aware that different jurisdictions have very different requirements, and as such an extension of IES 7 would make responsiveness to such recommendations difficult for a number of member bodies.

CPA Canada

Whereas we are aware that IES 7 does not align with a learning outcome approach it is important to note that most professional accounting bodies have regulators who have based continuing professional development regulations on an input approach. Accordingly we would not support burdening professional bodies with additional requirements merely for the sake of consistency with the philosophy of other standards.

In addition, having gone through the exercise on a number of occasions, we believe that, given the diversity of roles that are played by accountants in the myriad of post designation careers, the learning outcome approach to lifelong learning will necessitate generic learning outcomes that will provide little additional guidance to professional bodies. We further believe that the IAESB needs to concentrate on pre-certification
education and let post-certification education be left to the national professional accounting bodies and employers in their jurisdictions who best understand the landscape and who are better positioned to determine the learnings that will allow professional accountants to perform their jobs at the highest level.

Professional accountants have different needs for professional development, which may evolve and change over their individual professional lifetimes. We believe this is likely to hold true in most jurisdictions in which IFAC has members.

Consequently, we believe it would be impossible for the IAESB to define sets of learning outcomes for the many different roles accountants perform. The individual professional accountant, or perhaps his or her employing organization, would generally be in a better position to determine the specific CPD needs.

IFAC members are in the best position to react to new developments, such as the introduction of new accounting standards in a particular sector and to decide which of their members require CPD in response. In our view, the IES 7 is sufficiently principles-based such that different IFAC members around the world have flexibility in designing their CPD requirements.

Hence, before seeking to change individual standards, the IAESB should seek to have a thorough implementation monitoring exercise performed.

For these reasons, we would not support the establishment of a requirement for a learning-outcomes based approach or only an output approach to IES 7 at this time.
We recognize that there may be some issues with IES 7, however our view is that it is important to establish substantive benefits to the public interest of making revisions to IES 7 at this point. In our view the requirements of the extant IES 7 are well understood and widely implemented and the input-based approach is a universally understood and extensively used measure of CPD activity.

If the Board determines that there is sufficient reason to update IES 7, our recommendation would be to focus on better integrating the principles of an output-based approach with the very practical, simple input-based measure that is widely adopted currently – this may mean a more specific articulation of the current ‘combination’ approach. Given our comments above, we would though caution the Board against moving far from the current simplicity of the input based hours measurement.

A real learning outcome approach would require an output-based model to measure professional accountants’ CPD activities. This implies an expensive (who bears monitoring costs?) and continuous monitoring system (who audits the ones who control professionals?) for a profession where the confidentiality is of utmost importance. A viable path to reinforce IESs’ focus on learning outcome approach seems to be the removal of the option included in the current version of IES 7 that allows IFAC member bodies to measure professional accountants’ CPD activity only on the basis of input-based approaches. In this way IFAC member bodies can opt for the other two systems (i.e. output-based or combination approach). In the case of the combination approach, the actual disposition (included in the current version of IES 7) that prescribes how learning activities can be measured, should be reinforced explaining what kind of measurements are considered in line with the aim of IES 7. For example, in some settings, IFAC member bodies decide whether or not considering the attendance to a specific seminar as relevant activity for CPD simply examining the list of the topics that will be held during a seminar and the CVs of the people that will speak. Is it sufficient? If yes, what are the minimum requisites for the characteristics of the speakers? Especially in settings where the measure of professional accountants’ CPD activities relies primarily on this kind of activities, an alternative strategy may require that at the end of the seminar attendees should prove that they have actually learned e.g. filling in a short questionnaire.
Moreover, following modification to IES 8, IES 7 should recognize that IFAC member bodies share their responsibility not only with professionals, but also that professional firms and regulators are part of the system of quality control for continuing professional development.

Finally, the role of academia as long as the ones of other education providers could be emphasized in IES 7. At the moment, IES 7 does not put sufficient emphasis on the role that education providers and academia can have in the continuing development of practitioners (i.e. engagement partners). For example, engagement partners could establish constant relations with the academia where they can both contribute to the education of perspective accountants through the delivery of seminars/lectures and also by developing their own knowledge further by receiving updates about their technical skills as well as being up-to-dated about the evolution of the role of accountants and accounting, the social aspect associated to this profession and the relevance of accounting and audit quality for several stakeholders.

EYG

Given the fact that the other revised IESs require the achievement of prescribed learning outcomes, we believe that IES 7 should promote the adoption of an output-based approach to measuring CPD as a best practice. However, we believe that an input-based or combination approach to CPD should be allowed in IES 7 because these approaches can still provide support of the achievement of learning outcomes, particularly when there is evidence as to the effectiveness of the learning program attended. As a result, we do not suggest any revisions to IES 7. However, we do suggest the Board address the clarifications to IES 7 through implementation guidance.

We suggest that the IAESB provide examples of how a member body can apply a learning outcomes approach while using an input-based or combination measurement approach to CPD. Examples may include:

- Individual self-assessments to identify skills needed
- Development of competency frameworks and mapping the learning objectives of CPD programs to competency frameworks
• Creating individual learning plan templates which identifies the skills an individual needs to develop through CPD, plans necessary learning programs to achieve them and demonstrates competence has been obtained
• Using input from program facilitators on how well participants demonstrated performance at the level expected by the end of the program.
• Measuring the effectiveness of a program by using output-based measures (e.g., post event surveys measuring application and business impact), which gives assurance over the design of the program and then using input-based measures (e.g., attendance of the program) to gain assurance that an individual gained the relevant competencies.

We also believe that the Board should consider addressing assessment during CPD via experiential learning in IES 7 implementation guidance. As a learner progresses through their career, learning becomes increasingly skills focused (as opposed to knowledge focused), and therefore more difficult to assess within a learning program. Assessment of performance on the job therefore becomes more relevant. Additionally, IES 7 paragraph 15 indicates a 20/120 hours requirement; however, IES 7 does not specify if the hours requirement can only be achieved with formal learning. Therefore, we suggest that IES 7 implementation guidance clearly indicate the types of learning that count towards satisfying the 20/120 hours CPD requirement.

We also believe that IES 7 implementation guidance should provide guidance on the types of evidence that could be used for verification purposes in an output-based measurement approach. IES 7, paragraph 7 indicates that “objective assessments measured against a competency map developed either by the employer or by the professional body to reflect the individual’s level of competence” could be an example of evidence that could be used for verification purposes in an output-based approach. However, implementation guidance for IES 7 should provide examples of the types of objective assessments that are referenced in paragraph 7.

Finally, IES 7 paragraph A16 indicates that “input-based systems traditionally have been used to measure development and maintenance of competence because of the ease of measurement and verification. Input-based approaches have limitations; for example, they do not always measure the learning outcomes or
competence developed. IFAC member bodies may partially overcome these limitations by communicating the underlying objectives of continuing improvement of professional competence and a commitment to lifelong learning.” If an input-based approach is retained in IES 7, we suggest that the Board consider if validity of input-based systems can be improved through improved learning design, such as facilitators assessing whether learning was satisfactorily demonstrated within the program.

FEE

Overall, even if IES 7 was the first IES that was revised, it appears to match sufficiently with the other IESs. IES 7 refers to an output-based approach, which is a key element of the learning outcomes approach. IES 7 also works with IES 8, because IES 8 is about CPD.

It also appears that IFAC member bodies can foster a learning outcomes approach when developing CPD programmes without a re-alignment of IES 7 with other IESs. They might for example want to refer to the recently issued IAESB guidance on implementing a learning outcomes approach for professional accounting education.

Therefore, we consider IES 7 as it currently stands as sufficient.

HKICPA

We believe there is no need to change the current IES 7 as it already supports a learning outcomes approach, an input approach and a combination approach, which recognizes the diversity of practice across member bodies and in different jurisdictions. This should allow member bodies to formulate their approach to CPD which fits their particular education and learning environment.

ICAEW

The IAESB may consider that the time is right to revise IES 7 in one respect alone, which is to require an outputs-based approach to CPD requirements from all professional accountancy organisations and to abolish the options of inputs-based and combination approaches. ICAEW moved to an outputs-based CPD approach in 2005 and so clearly we believe it is the best approach because of the focus on the effectiveness of learning and development activities rather than other proxy measures such as the time spent on activities or the nature of particular activities. ICAEW’s CPD policy requires a member to reflect on their development needs, act by
undertaking appropriate CPD activities, and assess the impact of those activities against their development objectives.

Nevertheless, requiring professional accountancy organisations to change their approach to CPD is a considerable imposition as it affects all professional accountants, the support offerings from the bodies themselves and the scale of administrative and assessment resources required. Any such move should therefore be very carefully considered and approached with sensitivity. ICAEW does not recommend any other changes to IES 7, nor further publications seeking to link IES 7 and the other IESs more directly.

ICAG

IES 7 is a good standard and supports the learning outcomes of the other IESs. However, IES 7 must provide specific guidelines on CPD topics and duration necessary to provide the learning outcomes of each of the other IESs, such as IES8.

ICAP

Whilst we agree that transition from IPD to CPD is a seamless process, but it is very important to keep competence areas of CPD flexible and dependent upon the judgment of an individual professional accountant. The learning required under CPD phase is individual's role-specific and cannot be fully aligned to IPD, which is relatively generic in nature.

We suggest that IESs – 7 may introduce, initially, a preferable/suggestive documented approach of “reflect-act-assess impact”. A professional accountant may be advised/encouraged to use the said approach based on learning outcomes gained during IPD phase.

ICAS

We do not believe the IAESB needs to reopen IES7 Continuing Professional Development (2014). This standard already allows for a learning outcomes approach, an input approach and a combination approach. From our assessment of the IFAC member body returns, only a small minority of IFAC member bodies follow the output (outcomes) based approach. Those bodies that do so are coming from a particular education and learning environment. The reasons why many IFAC member bodies follow an input (or minor combination approach) relate to a regulatory environment requiring such a method.
Further IES7 is written for a very different purpose than the IPD standards (IES1-6). In IES1-6 there is an expectation of a significant element of formal final assessment. This is far less the case in IES7 and we see no demand, or push, for CPD that is regulated in the same terms of formal reassessment. There is certainly interesting developments in the medical professions in this regard, but we do not believe that there is evidence to suggest that professional accountants will benefit from a more formalised revalidation type scheme.

ICPAK

We take note of the IAESB views on IES 7 which was redrafted noting that it refers to an output-based approach, which is a key element of the learning outcomes approach. We posit that IES, being a CPD standard sufficiently supplements IES 7 and there is no need to further revisions before the IAESB monitors implementation of the same.

Regarding the need for other IESs, we opine that it would be impossible for the IAESB to define sets of learning outcomes for the countless of roles accountants perform throughout the world. Any other set of learning outcomes identified can be issued in the form of guidance to support IFAC member bodies and the individual members in setting up specific CPD needs and thereafter the relevant trainings and development.

INCP

Sin comentarios

English Translation
No Comment

IIRC

Turning to Continuing Professional Development, we suggest there is scope to offer more explicit direction around CPD on <IR> and other developments.

- Given the increasing areas of specialization within the wide-ranging roles performed by accountants, there may be merit in offering more specific guidance on competences relating to specific areas of specialism and strategic management. This could include pointing to recognized specialist competence models and paths (which could include the <IR> Competence Matrix).
As we note in the paragraphs above, the professional accountant increasingly operates in a changing environment. This may have implications over time on the nature of the role of the professional accountant or on specific areas of competence. It will not be practical or desirable for the IAESB to reflect all of these changes in prescribed competences or areas for CPD – but it may be valuable to IFAC member bodies and others for the IAESB to highlight changes and the implications for professional accountants’ development through reports or thought leadership papers that could be commissioned from expert third parties.

KASNEB-ICPAK  Even though the current IES 7 provides for various approaches to measurement of attainment of CPD, IES 1-4 and 8 are based on the learning outcomes approach. There is need to align IES 7 to the other IES’s by:

- Taking into consideration the dynamism of the profession and need to have tailor made attainment of learning outcomes for the various fields in the profession
- Providing for a well-defined competence map to the attainment of CPD based on the field in the profession
- Segmenting the requirements of CPD for young, matured and advanced professionals (in terms of skills).
- Providing a well-defined measurement approach for verification and demonstration of learning outcome on CPD

ICPAR  Forensic Auditing and Accounting

ICPAU  We propose that there should be a mandatory requirement under IES 7 specific to accountants in public practice and accountants in industry and business. We also note that whereas the input based method seems ideal, there is need to devise means on how to actually measure the learning outcome and competence achieved and ensure that they are demonstrable.
Professional accountants’ inherently diverse needs for professional development inevitably evolve and change over their individual professional lifetimes. We believe this is likely to hold true in most if not all jurisdictions in which IFAC has members.

Consequently, we believe it would be impossible for the IAESB to define sets of learning outcomes for the myriad of roles accountants perform throughout the world. Indeed, it is the individual professional accountant, or perhaps his or her employing organization, which will generally be in a better position to determine the specific CPD needs of any particular individual.

However, in the medium term, there are likely to be some professional accountants in some jurisdictions who may benefit more from a more standardized approach e.g., whereby IFAC members stipulate the number of hours of CPD, or even the content of CPD for certain groups of professional accountants. IFAC members are in the best position to react to national developments, such as the introduction of new accounting standards in a particular sector and to decide which of their members require CPD in response. In our view, the recently issued IES 7 is sufficiently principles-based as to allow different IFAC members around the world flexibility in designing their respective regimes for CPD.

In our opinion, this flexibility is still needed in order for CPD to work as effectively as possible for all jurisdictions.

As noted above, before embarking on changes to individual standards the IAESB should conduct a thorough implementation monitoring exercise.

For these reasons, we would not support the establishment of a requirement for a learning-outcomes based approach or only an output approach to IES 7 at this time.

Accountants now work in a rapidly changing environment and there are high demands for new and updated competences. In addition, the role and skills required of accountants evolve over the course of their careers and result in diverse CPD needs. The SMPC recognizes that it is not possible for the IAESB to establish the
learning outcomes for each of these roles and flexibility is necessary for CPD to effectively operate in all jurisdictions. We consider that the current requirements of IES 7 are sufficiently principles based to permit IFAC member bodies to implement and design their respective CPD systems.

However, we acknowledge that some jurisdictions may benefit from a more standardized approach including where IFAC member bodies specify the number of CPD hours. The Board may wish to consider whether the current requirements, such as paragraph 15 in IES 7 to “complete 20 hours (or equivalent learning units) of relevant professional development activity each year”, should remain the same in response to the significant trends and developments impacting the accountancy profession. This includes the variety of ways in which accountants can now access information and development courses.

We appreciate that there are risks with the input-based CPD approach, perhaps creating an obligation to fulfill minimum requirements which may be achieved, but is not focused on the areas necessary to be updated. However, there may also be significant difficulties in implementing and assessing a learning outcomes approach. It is important that accountants are encouraged to train on new developments and regulations affecting the profession and they strongly embrace a learning attitude.

ISCA  

To align the requirements of IES 7 in support of the learning outcomes approach of the other IESs, IAESB can include the expected competences and level of proficiency to enable professional accountants to continue to develop and benchmark themselves professionally based on their roles.

We appreciate that the IES 7 has provided IFAC member bodies flexibility in establishing their preferred approach to measuring the CPD activity of professional accountants and the Institute has adopted the input-based approach in measuring the CPD of our members. With regard to the output-based approach, we suggest that IAESB allow member bodies to exercise judgment in evaluation of their respective membership bodies for the applicability of the approach. More details on implementation and monitoring mechanism would be helpful for member bodies and the employers of professional accountants, especially the smaller setups, who are considering the adoption of this approach.
As reflective activities (e.g. record of learning, reflective record, or personal development portfolio) are commonly used in CPD courses, we would also like IAESB to provide further clarification and guidance in IES 7 on:

- The documentation required
- How it could be used and assessed to close identified competency gaps.

Please also refer to our comments in Question 1.

JICPA

The requirements of IES 7, such as the specific numbers of hours stated in Paragraph 15, codify good practice in continuing professional development that is already well established in many jurisdictions. IES 7 shows that output-based, input-based, or combination approaches are not inconsistent with a learning outcomes approach, and that all three are valid. In this respect, we believe this requirement has significant value.

The words output and outcome are similar, so they are easily confused, but they refer to different concepts. There is some tendency to envisage an evolutionary process whereby an initial input-based approach evolves into a combination approach, which then evolves into an output-based approach. According to this theory, input-based and combination approaches are interpreted as being no more than transitional, and in the end, only an output-based approach should remain. We believe this is incorrect. The IAESB must see the fact that a number of IFAC member bodies use the combination approach, and it should not revise the standards in a way that is inconsistent with the actual practice.

The learning outcomes approach entails individuals choosing required learning outcomes according to the roles they will perform and making those learning outcomes into their own learning targets. They then undertake learning activities employing a flexible combination of appropriate methods in light of a variety of circumstances, such as combining classroom-based courses with group discussions.

The archetypal example of a learning outcomes approach in terms of measurement is the incorporation of tests into e-learning courses. It is possible to measure the input from e-learning using output in the form of tests. Potentially, therefore, a combination approach could be used so that even if an individual does not spend
the recommended number of hours for a specific e-learning course, he or she could be deemed to have undertaken the study equivalent to the recommended number of hours and be granted those hours if he or she scores sufficiently well in the test.

Requiring a specific number of hours may be more rules-based than principles-based, but this stipulation is the cornerstone of continuing professional development. Even if an amendment were made to remove the statement relating to the number of hours, it is unlikely that professional bodies or jurisdictions with their own well-entrenched rules would do away with them. Therefore, even when the IAESB amends IES 7, we request the IAESB not to place too much emphasis on whether the standard looks more like principles-based or rules-based on the surface, but retains the provisions relating to specific numbers of hours in Paragraph 15. It would also be helpful if Paragraph 13 is revised to make it clear that the combination approach is the preferred approach already adopted in many jurisdictions.

PWC

Consistent with our comment letters on the IES 8 Exposure Drafts, we recommend aligning the principles of the two CPD Standards as closely as possible. This is an important step to eliminate confusion on the implementation of IES 8. Our original suggestion was that IES 8 would be an appendix to IES 7 – simply prescribing the competence expected to be maintained and developed by those performing the specific role within the profession – namely the engagement partner on financial statement audits - as part of their program of CPD.

We also recommend reflecting a learning outcomes approach to IES 7 which includes requiring professional accountants to identify desired/necessary capabilities and competencies, to seek out development opportunities to maintain or build them, and then to demonstrate the achievement of them.

We recommend the removal of an input only measurement approach from IES 7. We are supportive of an output only approach; however, we also believe there exists a reasoned approach that combines both input and output measures to achieve the ultimate objective of demonstrating what has been learned. We encourage
the IAESB to evaluate the requirement for a combined measurement approach, reflecting on the appropriate balance of both input and output measures and providing guidance on how to achieve that balance.

Recognising that as part of CPD, practical experience is a substantial contributor to growth and development, further exploration in the area of “Learning at Work” or “On the job Learning” would be welcomed, together with thought leadership and examples on the practical demonstration of capabilities gained in the course of professional work.

SAICA

The IAESB may consider that the time is right to revise IES 7 in one respect alone, which is to only require an outputs-based approach to CPD requirements from all professional accountancy organisations and to abolish the options of inputs-based and combination approaches. SAICA has for some time been discussing the ineffectiveness and pitfalls of an input based measurement approach has in driving actual learning and development in its members.

However, forcing member bodies to change their approach to CPD is a considerable imposition as it affects all accountants, the support offerings from the bodies themselves and the scale of administrative and assessment resources required. Any such move should therefore be very carefully considered and approached with sensitivity.

Further guidance or sharing of best practices from members bodies who already use an output measurement based approach would be considered useful to those bodies considering moving to an output based measurement basis.

WPK

Centering IES 8 on a learning outcomes approach seemed sensible given the fact that IES 8 focuses on a clearly defined role (Engagement Partners Responsible for Audits of Financial Statements). IES 7 applies to CPD of all professional accountants. It is hard to imagine how learning outcomes could be designed for the variety of roles professional accountants perform all over the world.
Beyond that, we believe that many member bodies currently take an input-based approach or a combination approach. Limiting CPD to a pure output-based approach might constitute a major challenge for all these member bodies.

**Question 3: What action, if any, should the IAESB take to improve professional competence related to the appropriate exercise of professional skepticism and professional judgment?**

**AAT**

It is unlikely that the importance of both professional skepticism and professional judgment will diminish in the near future. Professional competence should be improved through both awareness and understanding of these concepts. One approach could be to issue an “education” piece which explores both concepts in detail. It could take the form of an expanded guidance note or similar featuring explanations and case studies. The note could outline:

- the concepts
- the importance of the concepts
- how to apply them in response to a situation which could be to modify the approach to the audit or obtain further evidence for example
- the circumstances when professionals may be challenged in meeting the concepts such as working with a longstanding and trusted client, when trying to build a long term engagement and when audit assignments are time pressured
- the culture required in the firm to support the concepts, such as tone at the top, audit supervision and training.

**ACCA**

ACCA agrees with the IAESB that professional skepticism and professional judgment are critical skills, which are central to strengthening public trust and confidence in professional accountants. As part of the Clarity Project, ACCA understands that considerable thought was given to the areas of professional skepticism and
professional judgment. As a result, as noted in the consultation paper, IES 2, 3, 4 and 8 all include learning outcomes relating to both professional skepticism and professional judgment.

ACCA welcomes the fact that those references included in IES 2, 3 and 4 apply to ALL professional accountants, not just those who work within audit. We encourage the working party to continue to consider the wider community of professional accountants and not just those working on the audits of financial statement.

ACCA does not believe that changes to the existing IESs will address the growing concerns around lack of professional skepticism or professional judgment in the profession. As IES 4 states, planning effective learning and development in these areas involves due care and may include learning methods in which mentoring, reflective activity, time and experience play a role. This is reinforced in IES 8 which states that effective CPD in the areas of professional skepticism and professional judgment require a blend of learning methods in which mentoring, reflection and practical experience within the context of a work environment often play a key role.

ACCA believes it is additional guidance around the approach to planning effective learning and development for professional skepticism and professional judgment which would assist the profession, perhaps in the form of a tool kit or information paper, rather than further changes to the standards themselves.

**AICPA-PCEEC**

We note that the International Auditing and Assurance Standards Board (IAASB) has formed a working group comprised of representatives from the IAESB and the International Ethics Standards Board for Accountants (IESBA) to explore the topic of professional skepticism to consider what actions may be appropriate to enhance professional skepticism. We believe there is no additional action needed at this time by the IAESB. Once the results of other efforts are realized, the IAESB can consider those conclusions.

**ANAN**

The Association of National Accountants of Nigeria is of the opinion that the action that IAESB should take to improve the professional competence related to the appropriate exercise of professional skepticism and professional judgement is to lay more emphasis on IES 7.
Professional skepticism and professional judgment are skills that underpin the profession and in our view they are of paramount importance. However, accounting firms often receive comments from regulators noting that audit findings are a result of a lack of application of professional skepticism. Given the importance of these skills across all roles undertaken by professional accountants, we believe that the task of reviewing the application of professional skepticism and professional judgment should not fall solely to the IAESB, but should also include input from the various IFAC standard-setting boards. On that basis we support the work currently being undertaken by the Joint Working Group on professional skepticism and we ask as part of the work of this group that learning and development methods as well as benchmarks be fully considered.

While the IESs address the exercise of professional skepticism and professional judgment in IES 2, IES 3, IES 4 and IES 8, in our view the IAESB could do more to facilitate the implementation of these learning outcomes through the provision of guidance or implementation support. In addition, IES 7 does not provide specific guidance on the types of CPD that would be most effective with regards to these matters.

Areas of guidance and implementation support that the IAESB should consider in respect of these learning outcomes include:

- The types of CPD that could be most effective to enable the demonstration of appropriate professional skepticism and professional judgment
- How IFAC member bodies or providers of learning and development content can provide materials for learning that enable an individual to demonstrate achievement of the learning outcomes on professional judgment and professional skepticism
- How IFAC member bodies can identify, monitor and measure the learning associated with achievement of the learning outcomes on professional judgment and professional skepticism
- Whether there should be more focus on the communication, interviewing and critical thinking skills already identified in the existing suite of IPD IESs and in particular how the learning outcomes could be developed to enable application of professional skepticism and professional judgment
• Whether IES 5 on practical experience should have specific learning outcomes or guidance in respect of using a professional judgment framework as part of day to day workplace activity or through the mentoring process adopted by the practical experience supervisor

• Consideration by the IAESB of the comparable professional judgment and professional skepticism learning outcomes for those performing non-audit roles within the financial reporting supply chain (e.g., preparers of financial statements, advisors, tax practitioners)

The formats of guidance provided by the IAESB may include the release of practical guidance and examples on this topic, thought leadership, and potential collaboration with, or support of, scholars and researchers. As research on this topic continues to evolve, the standard-setting boards of IFAC should ensure that this remains at the forefront of the profession’s collective consciousness and we would ask that the IAESB work with the IAASB following their Invitation to Comment on Enhancing Audit Quality to identify specific areas of support that would be beneficial from a learning and development perspective.

CAP Australia

CPA Australia acknowledges the critical role that professional skepticism and professional judgement play in the accounting profession. It is recommended that the IAESB could utilize case-based examples to provide guidance to member bodies and to illustrate best practice in these areas. A series of case studies would provide an opportunity to show some of the diverse situations in which these skills are applied and would assist members in evaluating their individual approach to relevant professional issues.

CICPA

There has been a large body of auditing literature on audit professional skepticism and professional judgment. The IAESB may benefit from considering establishing task forces to study and analyze relevant literature (particularly the syntheses of literature), thus sorting incrementally useful notions or practices for the standard setting. Below are some examples of prior literature on professional skepticism and professional judgment.

Regarding professional skepticism:

Regarding professional judgment:

CIMA
The appropriate exercise of professional skepticism and professional judgment is of paramount importance to professional accountants. It is felt that the IESBA Handbook of the Code of Ethics for Professional Accountants – 2015 edition, adequately covers this topic. It is felt that there is enough guidance provided to professional bodies, in order for them to convey to their members.

CIPFA
The revised IES8 effectively considers matters relating to professional skepticism and professional judgement in the context of the work of the audit professional. However, these competencies do not just inform the work of auditors but of all professional accountants, who have a duty to ensure effective ethical and lawful financial management. CIPFA does not propose any further revisions to the new IESs to take account of this, but recommends that the IAESB considers how best to bears these matters in mind as it plans to develop thought leadership and other guidance materials for the implementation of the new IESs.
Common Content

In our view, the IAESB should limit its activities to having implementation monitoring performed. However, we recognize that professional skepticism and professional judgment are areas that the other standard setters under the auspices of IFAC are currently looking to address in their respective standards.

If, despite our view that the IAESB should not undertake initiatives in this area at this time, the IAESB chooses to commence work in these areas, the IAESB should coordinate such an approach with other standard setters, because it is imperative that the IAESB ensures that its treatment of professional skepticism and professional judgment is aligned with the treatment of these matters by the IAASB.

CPA Canada

It is our understanding that the IAASB is in consultation on “A Focus on Professional Skepticism, Quality Control and Group Audits”. We believe that the IAESB should stand back until the IAASB has completed that consultation and determined whether revised or new standards are required. The IAESB can then use that information to determine the best way to assist member bodies implement any new IAASB requirements.

Accordingly it is premature to establish this area as a strategic priority at this time. At most we would possibly see a future role for IAESB in thought leadership and guidance in this area and not in standards.

CPAPNG

The best way to address this would be through the CPDs. The IAESB can develop guidelines for PAOs in terms of what the competency requirements are so that accountants can be measured against it.

DTT

The importance of personal and professional values and attitudes, as well as communication of expectations of professional accountants, must not be underestimated within a professional accounting education. Effective demonstration of professional skepticism and professional judgement by professional accountants is in the public interest, and directly impacts public opinion about the accountancy profession.

We strongly endorse the proposed review of how professional skepticism and professional judgement are integrated into the IESs and encourage continued participation in the joint working group with the other Boards as described in paragraphs 18 and 19.
Key challenges for many aspiring and professional accountants are to both understand their own personal, cultural or psychological barriers to implementing these mindsets and to know what practical measures they can apply to integrate a mentality of professional skepticism and judgment into everything they do. Potential barriers arising from psychological challenges (confirmation bias, anchoring etc.) and cultural politeness (over-adherence to hierarchy, avoidance of direct questions etc.) can only be mitigated if accountants are aware of them and understand how they can be overcome.

The IAESB should establish the components that contribute to professional skepticism and professional judgement, and offer guidance on how these are developed in practice i.e. what activities, learning approaches etc. best support effective adoption including sharing examples of innovative approaches in these areas.

In addition, providing examples of what good, and bad, practice look like in relation to the exercise of professional judgement would provide valuable insight into how to think critically, and practical support to those designing and developing learning content in this area.

EAA

Some of the accounting scandals that have been observed over the last decades might have highlighted issues for some auditors to remain independent and resist to client pressure during particular circumstances.

Reinforcing topics related to engagement partners’ negotiation skills would then become relevant. It would be relevant that engagement partners would have strong “customer service orientation” but it should not be at the expense of their independence and skepticism. The provision of an auditing service, even if it is paid for by a company, should be carried out in the public interest, being the audit report the only document in a financial statement prepared by an external part, different from the company. This peculiarity makes such a report very important for all company’s stakeholders thus engagement partners should never lose their professional skepticism and professional judgment. In protecting public interest, IAESB could reinforce the emphasis on topics related to engagement partners’ negotiation skills, due to their delicate position: they do not have only a client (the firm) but they must satisfy the expectations of several other “clients”, i.e. all the several stakeholders of a company.
Given the fact that professional skepticism is a priority topic in the International Auditing and Assurance Standards Board (IAASB) Invitation to Comment (ITC), we believe that the IAESB should consider the input received from stakeholders as part of the ITC before determining the next steps on how to address professional skepticism and professional judgment in the IESs.

We do not see a role for the IAESB to improve professional competence related to the appropriate exercise of professional skepticism and professional judgment.

The IAESB is a standard setter for professional accounting education; it has developed IESs which are addressed to IFAC member bodies. IESs 2, 3, 4, and 8 refer to learning outcomes regarding professional skepticism and professional judgment, both in initial education and in CPD of professional accountants.

Apart from these education-related subjects in the IESs, we doubt that the IAESB can take action to improve professional competence within its mandate. If any, it may be the IAASB which could influence professional competence via the ISAs, as far as these are used in the various countries, and it appears that the IAASB has already started an initiative in this regard.

In the consultation document the IAESB acknowledges that the exercise of professional skepticism and professional judgment are already well covered in other standards such as International Auditing Standards and IFAC Code of Ethics. The IAESB will also be aware that the Boards responsible for those standards, the IAASB and the IESBA, are currently working on the topics, as are many IFAC member bodies and regulators worldwide. We believe that this is the correct approach. More standards are not the answer to improving professional judgment and skepticism as there needs to be practical, on the ground implementation assistance. IAESB may work closer with other standard setting boards such as IESBA and IAASB in promulgating professional skepticism and professional judgment particularly in the area of audit and quality assurance but does not need to develop initiatives of its own.
ICAEW agrees that “professional scepticism” and “professional judgement” are of essential importance for professional accountants. The IESs currently address these topics adequately and these are supported in-depth by the 2015 IESBA Code of Ethics for Professional Accountants.

ICAEW supports the joint working group between the IAASB, IESBA and IAESB. Professional scepticism is clearly covered by all three boards and we welcome efforts to ensure a coordinated and consistent approach. ICAEW will be responding to the IAASB consultation “a Focus On Professional Scepticism, Quality Control And Group Audits” as part of this collaborative approach.

The IAESB proposes to focus its future strategy on reviewing and expanding references to learning outcomes on the topics of professional scepticism and professional judgement (paragraph 8). We question whether further expansion or work is necessary in this area of the IESs. We also recommend that IAESB activity should be coordinated with the IAASB. Nothing should be taken forward until the IAASB has completed its consultation on “a Focus On Professional Scepticism, Quality Control And Group Audits” and progressed what it will be doing with regard to revised and new standards.

We have consistently taken the view that the onus should be on the requirements for firms, i.e. from the IAASB standards, to ensure that their audit teams and engagement partners have the necessary competencies. In practice this is seen in our implementation of IES 8 where we will require firms to ensure RIs have the IES 8 competencies and then our ICAEW Quality Assurance Department has a role in reviewing whether firms are achieving this.

ICASB may prescribe CPD requirements for attaining such professional competence. Also, the attributes of professional skepticism and professional judgment should be clearly articulated so that professional accountants can exercise them in the course of their work.

ICAP This problem is very complex and has many other dimensions. We believe that professional skepticism and professional judgment had been the haul mark of professional qualification. In last two decades, introduction
of highly sophisticated accounting and auditing soft-ware have impacted the mental development and practice of professional accountants in these areas. During IPD phase aspiring professional accountants face the following issues:

- Heavy size of data
- Complexities of transactions
- Absence of tangible trails due to digital processing
- Time and cost constraints

The solution they find is to use tools, checklist, SOPs and soft-ware, which sometimes lead them to compromise on using professional skepticism and professional judgment and at times they end up box ticking.

In view of the above, we suggest that IAESB may engage other stakeholder and initiate deliberation to find out (a) the root causes of the problem, (b) stakeholder who could be the part of solution and finally (c) a unified solution supported by all stakeholders.

**ICAS**

The exercise of professional scepticism and professional judgement are applications of standards and skills existing in other areas of the standards map i.e., ISA and IFAC Code of Ethics. Whilst we consider there has been a lack of correspondence, and crossover between the standard setting boards in the past, we do not think that IAESB should become involved as a standalone authority in this area. It is our view that the IAASB and IESBA, would benefit from the expertise of an IFAC education specialist in some of their deliberations. There is no need for such a specialist to come from another standard setting board.

We see that IFAC should consider using its education expertise across the organisation rather than supporting one standalone body.

**ICPAK**

We believe that the IAESB should limit its activities to implementation monitoring. We recognize that professional scepticism and professional judgment are areas that the other standard setters are currently
looking to address in their respective standards and believe that the IAESB can participate in this in the same manner that the IAASB contributes to the IESBA projects and vice versa.

ICPAR  Guidance and Communication

ICPAU  We believe that steps should be taken to ensure that during the phase of Initial Professional Development, skills of intellectual, interpersonal and organisational skills are blended with professional skepticism and judgement. This could be for instance be achieved by ensuring that assessments focus on scenario-based challenges which address the issues of professional skepticism and professional judgement.

IDW  At this stage, we believe that the IAESB should limit its activities to implementation monitoring. We recognize that professional skepticism and professional judgment are areas that the other standard setters under the auspices of IFAC are currently looking to address in their respective standards.

If, despite our view that the IAESB should not undertake initiatives in this area at this time, the IAESB chooses to commence work in these areas, the IAESB should coordinate with other standard setters, because it is imperative that the IAESB ensures that its treatment of professional skepticism and professional judgment is aligned with the treatment of these matters by the IAASB.

IFAC SMPC  Both professional skepticism and professional judgment are difficult to encourage and enforce by standards alone. The concepts are closely related. For example, professional skepticism can facilitate an individual being able to appropriately exercise professional judgement and the application of professional skepticism requires professional judgement. We welcome the joint working group which has been established to consider professional skepticism by the Board, the IAASB and the International Ethics Standards Board for Accountants (IESBA) to make recommendations to each standard setting board whether there is standard-setting or related work that can be undertaken. We believe that coordination on this issue is important and any action the Board decides to take should be aligned with the treatment of these matters by the other boards.
The Committee considers that the development of practical tools, such as short video case studies, may assist member organizations with fewer resources for use in their training materials. It may also be particularly helpful if these can be provided on-line, most notably for members who are located at long distances from their member body central offices. Both concepts can be difficult to understand, especially for students, and material with examples and guidance on how to effectively exercise professional judgment and skepticism may be useful. However, we believe that the establishment of the joint working group is currently sufficient and the IAESB itself should take no further action on these topics at this stage. In general, the SMPC believes that standard setting boards such as IAESB are not the appropriate party to produce practical tools, such as described above.

IIRC

We agree with the emphasis on professional scepticism in your paper and the linkages to enhanced competence. The IAESB's comment letter on the<IR> Competence Matrix made this point eloquently: 'The application of a principles-based approach requires greater emphasis on an individual's professional judgment and scepticism'. We believe that a greater emphasis on the linkages between strategy, the business model, risks and risk appetite, as well as competences around future-oriented information and prospects may provide useful in this regard.

As a wider comment, we believe that it will be beneficial to the corporate reporting system as a whole for accountants to continue to embrace their role of innovation, in keeping with their public interest remit, to ensure that corporate reporting remains relevant, market-led and links to wider trends – such as promoting financial stability and sustainable development. Enhancing skills in professional judgment and scepticism will be valuable to support this direction.

INCP

El IASESB debe ser un líder en las metodologías sugeridas a seguir cuando se enseña y cuando se ejerce el escepticismo profesional y juicio profesional. Una metodología que pueda asistir el proceso de capacitación que los profesionales de contaduría deben tener. Metodologías que deben ser incorporadas a las IESs existentes.
Metodologías basadas en las mejores prácticas de aquellos que son expertos en estos temas y de los cambios que a nivel global se enfrenta la profesión contable.

La incorporación del “Working Group” es un mecanismo que hará desde la Auditoría, Etica y los IESs ver las mejoras que se puedan considerar al hablar de escepticismo profesional y juicio profesional y a desarrollar una metodología integral.

Cuando estas metodologías existan se puede pedir a los miembros del IFAC que las mismas se incorporen a sus programas de formación (contaduría como carrera) y/o actualización de la profesión con un grado de regularidad y un grado de intensidad en los programas respectivos dejando evidencia del completamiento de los mismos.

English Translation

The IASESB must be a leader in the suggested methodologies to follow when it is taught and when there is the professional skepticism and professional judgment. A methodology that can assist the training process that accounting professionals should have. Methodologies that should be incorporated into the existing IESs.

Methodologies based on best practices of those who are experts on these issues and the changes facing global accounting profession.

The incorporation of the "Working Group" is a mechanism that will make from the audit, ethics and the IESs see improvements which may be deemed to speak of professional skepticism and professional judgment and to develop a comprehensive methodology.

When these methodologies can be ordered members of the IFAC them join its programs of training (accounting as a career) and/or update of the profession with a degree of regularity and a degree of intensity in the respective programs leaving evidence of the completion of the same.
With reference to the IAASB definitions included in IES 4:

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<tr>
<th>Defined Term</th>
<th>Definition in IAASB Glossary of Terms</th>
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<tr>
<td>Professional Skepticism</td>
<td>An <em>attitude</em> that includes a questioning mind, being <em>alert to conditions which may include possible misstatement</em> due to error or fraud, and a critical assessment of evidence.</td>
</tr>
<tr>
<td>Professional Judgment</td>
<td>The <em>application of relevant training, knowledge and experience</em>, within the context provided by auditing, accounting and ethical standards, in making informed decisions about the courses of action that are appropriate in the circumstances of the audit engagement.</td>
</tr>
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Professional competence related to the appropriate exercise of professional scepticism and professional judgment involves the attitude of the professional accountant with relevant training, knowledge and experience. As such, we suggest that IAESB provide practical guidance and compilation of literature (e.g. red flags in past fraud cases), which act as resources for professional accountants to critically think through issues and different considerations before arriving at conclusions.

We do not recommend extensive expansion of references to these topics in existing or new IESs, as the revisions could be too prescriptive in nature, which will be contrary to the nature of professional scepticism and professional judgment.

Please also refer to our comments in Question 1.

To ensure the appropriate exercise of professional skepticism and professional judgment from an educational perspective, the IAESB should amend International Education Practice Statement (IEPS) 1 Approaches to Developing and Maintaining Professional Values, Ethics and Attitudes to make the guidelines more
comprehensive. The IESs stipulate that competence areas within professional values, ethics, and attitudes include professional skepticism and professional judgment, yet the IEPS 1 barely mentions these attributes. If their importance is increasing, there is an urgent need to amend the IEPS 1 accordingly.

Furthermore, the IAESB should look into the most effective ways of learning about the professional skepticism and professional judgment and develop appropriate learning tools. It is no use in practice, for instance, if individuals simply memorize the definitions of these terms and reproduce them accurately on a test paper, and it would be very difficult to gain professional experience of a range of scenarios in a systematic and efficient way within the workplace. As we are reminded by the proverb “Fools say they learn from experience; I prefer to learn from the experience of others,” professionals should not rely on their own practical experience alone, but should learn from the experiences of their predecessors. As the IAESB has already addressed professional ethics education with the release of the “Ethics Education Toolkit Videos” and “Ethics Education Toolkit Study Guides,” we believe that similar initiatives can be taken with regard to the professional skepticism and professional judgment.

**KASNEB-ICPAK**

The concept of professional skepticism is complex and difficult to address because of behavioral and psychological aspects. The board should concentrate on providing guidance how to effectively respond to issues related to the dynamic nature of professional skepticism.

**PWC**

We support the cross Standard Setting Board project on professional skepticism, but would caution against taking responsive actions without further study or collation of existing research.

We recommend that any actions taken need to be based on understanding of true root causes of lack of professional skepticism or poor application/documentation of professional judgement in order to have impact.

We believe that training on “how to be professionally skeptical” of “applying professional judgment” will have limited impact.
SAICA believes at this stage that the IAESB activities should be limited to implementing monitoring and possibly issuing further implementation guidance based on areas of difficulties member bodies are facing in implementation of the revised education standards.

We agree that “professional scepticism” and “professional judgement” are of essential importance for professional accountants. The IESs currently address these topics adequately if not in more detail than needed when considered in addition to the in-depth 2015 IESBA Code of Ethics for Professional Accountants.

SAICA is in support of the joint working group between the IAASB, IESBA and IAESB, as scepticism is clearly covered by all three boards and they do need to be coordinated and consistent.

The IAESB proposes to focus its future strategy on reviewing and expanding references to learning outcomes on the topics of professional scepticism and professional judgement (paragraph 8). We question whether further expansion or work is necessary in this area of the IESs.

We also recommend that IAESB activity should be coordinated with the IAASB. Nothing should be taken forward until the IAASB has completed its consultation on “A Focus On Professional Scepticism, Quality Control and Group Audits” and progressed what it will be doing with regard to revised and new standards.

We are not convinced that the IAESB should take actions here. If the IAESB nevertheless decides to start working in this area, it should coordinate with other Standard-Setting Boards in order to avoid misunderstandings.

There has been a large body of auditing literature on audit professional skepticism and professional judgment. The IAESB may benefit from considering establishing task forces to study and analyze relevant literature (particularly the syntheses of literature), thus sorting incrementally useful notions or practices for the standard setting. Below are some examples of prior literature on professional skepticism and professional judgment.
Selected literature regarding professional skepticism:


Question 4: What new IESs, if any, do you suggest be developed to address emerging matters related to the education of aspiring professional accountants and professional accountants?

AAT

There is a difficult balance to strike between creating standards to respond to emerging matters and ensuring the existing standards are sufficiently broad in concept to embrace the same. The profession will soon experience significant change in the skills and competencies required of both aspiring and professional accountants. The challenges faced by big data and the impact of this on the work of the accountant and auditor cannot be underestimated. This when coupled with the impact of auditing companies which are early adopters of emerging technologies or issues around cloud computing will all need consideration. However AAT is not convinced that new IESs are necessarily required (see comments below in response to question 5).

ACCA

ACCA does not believe that there is a need for any new IESs at this time. The existing, recently revised IESs 1-7 adequately address the IPD and CPD needs of the wider accounting profession. IES 8 provides standards for engagement partners responsible for audits of financial statements. This role is defined within the International Standards on Auditing, has a well understood and discrete skills set, and is a reserved occupation within the majority of jurisdictions. ACCA does not believe that there are other accounting roles that fit these criteria and that cannot be adequately addressed through the requirements of IES 7.

ACCA is concerned by the reference to developing material related to standards in partnership with leaders in the relevant fields. ACCA values the independence of IAESB as a standard setter and would be disappointed to see it aligning too closely with bodies in specific fields when there will be many other IFAC member bodies operating within those same fields. The IFAC Gateway already provides an excellent vehicle should IFAC member bodies wish to disseminate their learning and development material, such as competence frameworks for specialist roles, to advance the wider profession.

AICPA-PCEEC

We believe no new IESs should be developed at this time.
The IAESB recognizes that time is needed to allow IFAC member bodies to fully implement the recently revised IESs before assessing whether the goals of the standards are being achieved. As member bodies implement the existing standards, the IAESB should encourage member bodies to provide feedback to the IAESB for its consideration. Such feedback could inform the IAESB and other member bodies so that the need for new or revised standards can be evaluated. Writing new standards before a significant number of implementation issues by various member bodies are identified would be premature.

**ANAN**

The new IESs we are suggesting to be developed to address emerging matters related to the education of aspiring professional accountants and professional accountants are:

a. The board should craft out a standard that will emphasize the need for all PAOs to include case study in their curriculum. Accounting has moved far away from theory to practical application of knowledge based on various business practices that require financial justification of an action and the right direction to go among conflicting options.

b. Encouraging teaching and learning of different languages at different levels of the profession due to the growing demands placed on professional accountants to work in different jurisdiction.

c. IAESB should develop a standard that will compel the PAOs to do post attendance test for their members after the CPD.

**BDO**

In addition to the items outlined below, please refer also to our response for Question 2. The consultation paper identifies a need to take into account the dynamic impact of IT and different competences required of aspiring and professional accountants. We agree with identification of such gap and, as we noted earlier, believe it is as important that aspiring and professional accountants have not only the requisite IT skills to be able to understand the financial reporting supply chain, but also to have the necessary skills to be able to successfully use IT as part of their own activities.

While the consultation paper proposes updating the existing IESs for this area, we do not believe that this is sufficient. While updating the IPD standards for skills related to IT matters will enable a base level of
knowledge, and IES 8 would specify the learning outcomes that engagement partners should achieve, this leaves a larger number of professional accountants performing a wide range of roles where no requirements are provided. In our view IT skills needed to perform in an IT environment should be covered by their own IES to highlight their importance and be given sufficient prominence as part of the curricula for aspiring professional accountants. We believe that IT skills learning outcomes should also be considered and aligned to the revision of IES 7.

While perhaps not an emerging matter, we believe the IAESB should give consideration to whether professional skepticism and professional judgment should have a separate IES or whether it is best served by being included in the revised IES 7.

CIMA

We believe there is no need for any further IESs to be developed at the moment. It is felt that time should be given for bodies to adopt the existing suite of IESs. Monitoring the implementation of the existing standards is important, and this is where it is felt resources should be focused.

As the role and challenges of a professional accountant change over time, then it is felt that either the existing IESs be reviewed at an appropriate time, or that new IESs be contemplated, when the time is right.

CIPFA

In general, the specific concerns of IES8 notwithstanding, CIPFA supports the generic approach contained within the IESs. However, specialization amongst professional accountants is clearly growing (not least in management accounting, tax and financial services). Specialisms such as these are commonly developed after the completion of IPD and practical experience requirements. Therefore, there may be a case for the development of further specialist CPD IESs along the lines of IES8.

However, CIPFA does feel that government and public sector accounting and its relation to public financial management is currently underrepresented within the IESs, and has implications for IPD as well as CPD. As noted above, the introduction of IPSAS, and accruals accounting more widely across the government and public sector, has led to a significant acceleration of professionalization and the development of professional
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For example, asset management, revenue generation and its treatment and financial reporting differ markedly in public sector as compared to corporate accounting, and the field of public audit as a distinct area of practice and the development of a global approach by the International Organizations of Supreme Audit Institutions is gathering pace. There exists the opportunity for the IAESB to consider the development of a separate IES to address these issues and reflect the needs of aspiring professional accountants in the government and wider public sector.

Common Content

We do not believe it would be appropriate for the IAESB to establish new IESs at this time, but refer to our response to Question 1.

See response to Question 1 for additional information

CPA Australia

CPA Australia does not believe there is a current need for the development of any additional IESs. It is acknowledged that the accounting profession has significantly increased the scope of practice in recent years and would benefit from guidance from the IAESB as to how new areas of practice align within the existing standards. It is recommended that guidance documents be provided to ensure member bodies are able to identify how to incorporate content related to emerging issues in accounting through sound implementation of the existing IESs.

CPA Canada

We do not believe that any new IESs should be developed. As stated earlier we believe a period of stability is needed to allow for the impact of the current IESs to be fully assessed. The principles espoused in the current IESs reflect the importance of the development and maintenance of high quality and relevant education programs for both initial and continuing professional education. These principles, combined with the fact that many member bodies need to comply with the requirements of local regulators, clearly indicate the need for member bodies to ensure their education programs remain current by addressing emerging matters. In addition, many of the mature member bodies undertake significant research activities. The IAESB should be reviewing the relevance of the research currently being undertaken by the member bodies as part of the IAESB’s work plan.
Therefore, we do not support any revision of existing standards or the development of new standards. We do believe that the IAESB should be collecting best practices and developing guidance around those best practices to assist developing accounting bodies.

CPAPNG

I have partly responded to this in question 1. An IES devoted totally to imparting accountants/auditors with IT skills in a changing world would be a step in the right direction.

DTT

In response to paragraph 21, we would offer caution on developing additional standards on other professional accountancy roles beyond that of the Audit Engagement Partner (AEP). While there are other recognized roles such as management accountant, CFO, internal auditor etc., they are not specifically defined in the way that the AEP is defined in the ISAs, and so effective identification of those for whom such role specific standards are intended could be problematic. We recall that IES 8 was rewritten in part to address this specific issue, and so the Board should be very careful about trying to write standards for other, less well defined, roles. Moreover, the AEP role has a clear and unique public interest role, in contrast to other roles.

Overall, we would suggest a period of calm in terms of standard setting on IESs, with changes limited to minor maintenance; and that the Board concentrate on ensuring that the IESs are underpinned by a suite of quality guidance material that support practical implementation, particularly in developing economies.

However, in relation to the role of the accounting educator (discussed under the heading Advancing International Debate in paragraph 24), we recommend the Board consider whether there is a need for standards to establish requirements for accounting educators. The effectiveness of the educator is a critical success factor in professional accounting education and little attention has been paid to this area to date in terms of standards or guidance.

EAA

Data analytic skills as long as IT and computer skills are also of utmost importance for accounting activity. Recently there has been a lively debate on the importance of "Big Data" to the future of business and
accounting. The challenge facing accounting profession is how to analyze huge data sets in a manner that extracts value-added insights. This requires integrating critical thinking and data analytic skills into typical accounting topics. On the one side, Big Data is an opportunity to have deeper insights into the determinants of companies' performance. On the other side, dealing with Big Data requires a change in mindset for accountants since they need to feel comfortable in making use of it, as they are accustomed to have structured and verifiable data thus different from what big data actually are.

It is worth noticing that, according to a recent survey (https://www.aacu.org/leap/public-opinion-research/2015-survey-results), even American Millennials (those between the ages of 16 and 34), who are commonly defined as ‘digital natives’, are not sufficiently expert in technology according to their bosses. Moreover, American Institutes for Research (AIR) analysis, based on data from the 2012 Programme for the International Assessment of Adult Competencies (PIAAC), conducted by the Organization of Economic Cooperation and Development found that 91 percent of Millennials consider a lack of computer skills irrelevant to their job prospects.

For aspiring professional accountants, this trend and the abovementioned evidence suggest the introduction of courses at the IPD (Initial Professional Development) stage where these issues are risen. Dealing with such issues at a Continuing Professional Development (CPD) stage could be more problematic especially when professionals did not receive any training on data analytic skills during their IPD and have important positions being at an advanced stage of their professional carrier. However, it is something that the accounting profession must face thus specific initiatives about that should be considered.

EYG

We do not believe any new IESs should be issued at this time.

FEE

Although we do not disagree that there may be potential areas of professional specialization for professional accountants in future, we doubt that additional international CPD standards are required to address such potential developments and we are not convinced that such CPD standards should be issued by the IAESB.
Once the initial professional development, which is sufficiently covered by the existing IES, is completed, it is up to the individual professional to keep up with CPD requirements in general and to consider potential areas of specialization. Such areas of specialization will significantly vary across countries and regions, depending on economic and other factors in general and also depending on market needs, which are driven by clients and employers.

As mentioned in the consultation paper, innovation drives change; however, it is not a given that standards drive innovation. Rather, they set a general framework for continuous quality.

We believe that the strength of the IAESB lies in setting principles-based standards that remain relevant in a changing environment. This allows IFAC member bodies to react to emerging issues and fine-tune their education where relevant, while a fundamental and consistent level of quality is preserved. The current IESs give IFAC member bodies the flexibility to address CPD needs that may emerge in certain countries or regions.

HKICPA

We do not believe there are any new IES that need to be developed to deal with emerging matters such as IT innovation. It may be more effective to leave the market forces in the local jurisdiction to address those emerging matters instead of IAESB developing a global set of IESs with the ambition of a one size fits all.

In general we take the same view as expressed in answering Question 3. This is not a matter of developing new standards to address emerging issues. The issues may vary in nature and intensity from market to market and IFAC and member bodies are best placed to identify emerging issues and to respond appropriately. IAESB may have a role in assisting with the response but should not prioritize this as its own initiative.

ICAEW

ICAEW agrees that professional accountants must increasingly adapt and develop their competencies as new challenges emerge. However external factors such as changes in technology and market forces will vary significantly according to jurisdiction, institutional settings, and the size of the professional accountancy organization, and therefore developing a one size fits all global set of IESs or enhancing existing IESs in areas such as IT competence may not be attuned to the regional differences in which the profession operates.
ICAEW believes that the activities of the IAESB and the guidance issued, may serve as a useful resource and guidance for professional accountancy organizations in the initial stages of designing and implementing a learning outcomes approach for their members. It may therefore be more productive for the IESs and IAESB pronouncements aimed at supporting and mentoring such PAOs at a critical stage in strengthening their structures and processes, particularly those in emerging economies.

For this purpose, it may be more appropriate that the ambitions of the IAESB may be better placed under the auspices of the IFAC Professional Accountancy Organization Development Committee (PAODC) which has the mandate to promote and facilitate the establishment and strengthening of professional accountancy organizations in support of the public interest. IFAC committees are close to the daily challenges of PAOs and their members. Furthermore, it may be more economical and less resource intensive to retain this function under the umbrella of IFAC rather than a separate independent standard-setting body.

ICAG
The IAESB should prescribe to PAOs to develop study materials, accredit tuition providers and promote articleship for aspiring accountants. The tutors of professional courses must undergo trainer-of-trainers courses to sharpen their skills and become abreast with changes in standards.

ICAP
Considering the existing set of IESs, we do not suggest any additional IESs.

ICAS
There are no new IES that we consider need to be developed by the IAESB. In the medium term there needs to be a mechanism for re-evaluating the landscape. There are a number of alternative ways this could be carried out without a permanent standard setting board. We would be happy to provide our thoughts on such structures if required.

ICPAK
We do not have any at the moment and believe the focus should be on monitoring the implementation.
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<tr>
<td>ICPAU</td>
<td>We propose that soft skills such as intellectual, interpersonal, communication and organizational skills can be embedded within the IES at all stages of initial professional development, practical experience and continuing professional development. We also recognize the increasing importance and impact of IT and data analytics on audit and accounting field. We believe that enhancements can be made to IESs to ensure that more content is provided on this area during Initial Professional Development and Continuing Professional Development phase.</td>
</tr>
<tr>
<td>IDW</td>
<td>We do not believe it would be appropriate for the IAESB to establish new IESs at this time, but refer to our response to Question 1. See response of question1 for additional information</td>
</tr>
<tr>
<td>IFAC SMPC</td>
<td>The SMPC does not believe that any new IESs should be developed at this time to address emerging matters. In our opinion, the Board should to focus its resources on a robust implementation monitoring exercise and continue promoting the adoption of the newly revised IESs.</td>
</tr>
<tr>
<td>INCP</td>
<td>IT Skills (XBRL, cibertecnologia, cloud IT, ERPs, entre otros). La tecnología forma parte integral de las habilidades que un Contador debe tener en el ejercicio de la profesión. Debería existir un IES exclusivo para prescribir las competencias técnicas sobre IT. English Translation IT Skills (XBRL, cyber-technology, cloud IT, ERPs, among others). Technology is an integral part of the skills that a counter should be the practice of the profession. There should be an exclusive IES to prescribe technical competences about IT.</td>
</tr>
<tr>
<td>ISCA</td>
<td>We agree with the IAESB that there could be new IESs (or included as enhancements to existing IESs) to provide CPD guidelines that build on essential competence areas for professional accountants undertaking</td>
</tr>
</tbody>
</table>

See response for Question 1 for
jobs in different specialisations such as external and internal audit, financial or corporate reporting and business valuation.
Other than the above, we suggest that IAESB consider providing IPD guidelines on the calibration of the levels of proficiency and learning outcomes approach for accounting education programs pitched at different levels. The current prescribed levels of proficiency and learning outcomes approach are developed with senior levels of the profession or fully qualified professional accountants in mind. As mentioned in IES 1, IAESB recognises that there are different pathways through professional accounting education programs and “that completion of a full, professional qualification is just one of a range of exit points from a professional accounting education program.”
Please also refer to our comments in Question 1.

JICPA
As the IAESB should focus on activities related to the adoption and implementation support, there are no specific areas that urgently require the development of a new IESs. If, however, the development of a new IES is deemed necessary in future, an objective and rational decision based on a reasonable evaluation and assessment of the environment surrounding the accounting education and the need for the new standard will be necessary.

Even if there is a strong need to develop a new standard, it would also be essential that the IAESB considers, in full, what would be the proper format to address its need for the given area, that is, whether it should be addressed by a standard or a guideline. For example, a standard for a specific area should be drafted by a specialist with competence and ample experience in that field, but the more particularized such provisions become, the more likely it is that such provisions be incompatible with the principles-based nature of the IESs, and the frequent revisions may also be required in response to the developments in practice.

KASNEB-ICPAK
In our view the new IESs, to be developed to address emerging matters related to the education of aspiring professional accountants and professional accountants are:
- Standards on data analytics and informatics and IT education for aspiring professional accountants and professional accountants
- Standards on banking professionals and financial institutions accountants
- Standards on education for public sector professionals for aspiring professional accountants
- Standards on Insurance professionals
- Standards for Accounting Technicians qualification

PWC

The determination of new IESs would result from the evaluation of the underlying skills needed by a professional accountant. We do not recommend a topic based approach, but rather the identification of those skills that contribute to the accounting profession of the future.

SAICA

SAICA does not believe it appropriate for the IAESB to enhance any of the existing education standards nor develop any new education standards at this time (Refer comments above).

SAICA believes that the activities of the IAESB and the guidance issued, may serve as a useful resource and guidance for professional accountancy bodies that are in the initial stages of designing and putting in place a learning outcomes approach for their members (or those who indicate difficulties in implementing the revised education standards). It may therefore be more productive for the IESs and IAESB pronouncements to be developed with the purpose of supporting and mentoring those member bodies which are looking to strengthen their structures and processes and develop high-quality standards, possibly in developing countries.

We believe that IAESB would have a much more significant impact if it focused its endeavors on thought leadership and best practice guidance in the education area. Indeed a specific area of focus should be on reviewing best practices throughout the IFAC membership.

It may therefore be more economical and less resource intensive to retain this function under the umbrella of IFAC in another committee (eg PAODC) rather than a separate independent standard-setting body. In reviewing its work plan in consultation with stakeholders the IAESB and IFAC should consider whether the IAESB’s focus should be entirely in this area and not on standard setting.
WPK  We refer to our general remarks above and to our response to Question 1: We cannot see any need to develop new IESs, at least for the moment and the next years unless new circumstances arise.

Question 5: What other activities, if any, do you suggest the IAESB prioritize for the period 2017-2021 (for example, implementation support; guidance; communications; thought leadership publications)?

AAT  The time is right for the IAESB to prioritize supplementary materials that seek to support the implementation of the existing standards. This could include practical examples of good practice and case studies to explore aspects of specific standards. These mechanisms could also be used to respond to new or emerging issues that don’t warrant the creation of a new standard. Aspects of this support could be tailored to provide support directly to the smaller accounting firms themselves to create awareness of best practice in the education and training of their employees.

A wider range of communication media could be employed to reach audiences in different ways such as pod or video casts providing commentary on topics.

One mechanism through which the board could raise its external profile could be through the creation of “thought leadership” pieces by experts. These, as with the examples above, could respond to new or emerging issues or provide updates on existing concepts contained within current standards.

ACCA  As noted in our response to question 1, an IAESB priority post 2016 should be to undertake research into the adoption and implementation of the existing IESs, and from that work identify any enhancements, or adoption and implementation support, that may be necessary.
ACCA also believes that further promotion of the existing IESs is necessary to ensure they are known and understood, not just by the IFAC member bodies, but by the many other educational bodies who are responsible for the development and delivery of professional accounting education programs.

ACCA is supportive of the proposal for thought leadership on the importance of the accountancy educator and its centrality to developments in accounting education. Consideration of the competences expected of accounting educators would be particularly welcome.

AICPA-PCEEC
In the near term, we believe the IAESB should limit its activities to observing the implementation process, identifying issues experienced by member states during implementation, and describing deficiencies identified through the implementation process. In the longer term we believe such descriptions can be used as a basis of discussion to determine whether new standards or revisions of existing standards are needed.

ANAN
ANAN is satisfied with the current IAESB priorities for the period 2017-2021.

BDO
We noted earlier that the IAESB should continue to consider how best to provide implementation support and guidance to IFAC member bodies and other stakeholders. Other areas for further consideration include:

- Providing implementation support or guidance to IFAC member bodies who do not have direct influence on the learning and development provided to aspiring professional accountants or professional accountants. This support could include examples of how to influence key stakeholders to enable IFAC member bodies to use their best endeavors as outlined in the statement of membership obligations.
- Use of thought-leadership activities to enable the IAESB and the wider profession to share innovative techniques and topics in the learning and development of aspiring and professional accountants.

CIMA
It is felt that the IAESB should continue with the work on supporting the implementation of the recently revised IESs. This will allow all IFAC members the necessary time to adopt changes to reflect these standards.
One recommendation would be to provide case studies of exemplar bodies’ application of standards, to support the adoption by all IFAC members. If guidance, communications, and/or thought leadership publications could complement this activity, then that would be supported.

If other events dictate that the existing IESs require updating, or any new ones, then that would be supported. However, at this stage, it is not envisaged that either of these are required.

CIPFA

Now that the process of revision of the extant IESs (hopefully to be joined by a fully revised IES7) is nearing completion, there is clearly much to do to enable and support the wider accounting education world to embrace and adopt them. CIPFA welcomes the recently prepared thought leadership paper for IES1 and would like to see a consistency to this approach, with a suite of similar papers produced for each of the IESs. However, thought leadership alone will not ensure the effective adoption of the new IESs. For this to happen consistently, PAOs around the world will require further practical advice and guidance in not only the benefits, but the process of implementation of the IESs. Clearly, this is a major undertaking, and for this reason CIPFA supports the proposal in the consultation paper that the assessment of learning outcomes through practical experience and reflective activities identifies in IES4 would be a valuable starting point. We would add to this, however, some consideration of the impact of the new IESs and in particular the learning outcomes approach on the role of the accounting educator. While the IESs cannot bind stakeholders other than the PAOs and are so quite properly addressed to them, the tertiary education sector is of critical importance in ensuring their adoption and relevance. CIPFA should therefore welcome the IAESBs early consideration of, and inclusion in its forward strategy and priorities, how best to enable this to take place.

Common Content

In our view, a thorough implementation monitoring exercise should be the main focus for the immediate future; however, the IAESB may not be the appropriate body to carry this out. Only once the results of such monitoring have been obtained and analyzed should the IAESB add specific projects to enhance existing standards or develop new standards to its work plan. We refer to our response to Question 1.
Our comments are provided from an ‘educators’ and ‘research’ perspective and are limited to question 5 regarding other activities to be considered by the IESB. Our comments are informed by two recent research articles on accounting education (Madsen, 2015; Rebele & St.Pierre, 2015).

The role of research on accounting education and the link to actual accounting education
Rebele & St. Pierre (2015) argue that there is evidence that accounting education research exhibits signs of stagnation. It is highlighted that there is a gap between accounting education research and the practical application research findings in the classroom. The authors, suggest that the very limited number of empirical studies on accounting curriculum and instruction means that researchers are simply describing the status quo, which would provide little motivation or support for change.

Two important question to highlight here is: Do accounting educators actually read the research articles in the accounting education journals? And is accounting education research having an impact on accounting education practice? We consider these two questions important for the IAESB.

For the IEASB, we would like to propose some consideration of the linkages between research on accounting education, the educators and the quality of accounting education (in part embedded in the IESs). In addition, consideration of the various suppliers of education in the knowledge creation chain, ensuring that the educating institutions complement each other to create continuous high-level quality education in accountancy.

From a research side, more research is needed on the supply of audit education. On most cases we observe a focus on accounting education, and less is known on the quality of audit education throughout the knowledge creation chain within the profession. Perhaps the IAESB can contribute with cases, discussion papers or alike.

In addition we would like to raise the issue that more research on audit education (vs. accounting education) would help more sound decision making regarding what action the IAESB could take to, for example encourage education that supported improved professional competence related to the appropriate exercise of professional skepticism and professional judgment.
Understanding the role of universities vs. professional associations in the accounting education chain globally

Encourage more cross-border research on understanding not only quality, but quality-affecting-factors on accounting education globally. We have recently seen an interesting, US based research study on the quality of accounting students relative to non-accounting business students and relative to non-business students using surveys of incoming college freshmen available since 1971, as administered by the Cooperative Institutional Research Program of the Higher Education Research Institute (HERI) (University of California, Los Angeles) in the US (Madsen, 2015).

Madsen focused specifically on several measures of the quality of students selected into accounting degree programs and the relative incomes of young, college-educated accountants. This approach enabled him to quantitatively characterize the quality of accounting education in the 1970s and 2000s and estimate how it has changed relative to other disciplines. Madsen (2015) concludes that the survival of accounting education depends upon how well it performs relative to the available alternatives. His study suggests that accounting has not been an overwhelming winner in the competition among educational alternatives, it has also not been a loser relative to most of the alternatives.

The IAESB may want to consider a discussion that embraced further clarification the role of various educating institutions that all together contribute to the establishment of professional competence within the accounting profession.

Understanding audit education for specialty areas

In addition, we would like to raise the question on the role of IES for specialty areas such as;

- CSR, integrated Reporting, and other non-financial reporting areas
- XBRL – considering the impact of real-time reporting on the education of professional accountants
Public sector accounting. With the rise and spread of IPSAS (and, for example, the development of EPSAS based IPSAS in Europe) is the education of public sector accountants deserving additional focus by the IAESB?

In particular relation to the above topics, we raise concerns as to whether the IAESB delegates the training of professional accountants in line with these topics only to professional training institutions (bodies) or if the IAESB would seek further engagement with Universities to ensure a proper realignment of university curricula with the standards of the board. We recognize that, significant differences between professional bodies curriculum and those of universities exists to the extent of not only these topics but in broader terms the standards of the board.

References


CPA Australia recognizes a need for the IAESB to ensure ongoing communication with member bodies to allow monitoring of the implementation and use of the existing IESs. The ongoing provision of implementation guidance would add value for member bodies in emerging nations and allow for enhanced education for aspiring professional accountants and professional accountants. As noted in Question 4, CPA Australia also recommends that guidance documents are provided to assist with incorporation of new areas of practice into accounting education programs.

CPA Australia recognizes the role of academic institutions in the provision of quality accounting education programs. In order to enhance opportunities for academic institutions to ensure that accounting education
programs align to the content and spirit of the IESs it is recommended that the IAESB commit to providing education resources to all academic institutions delivering accounting qualifications to inform all academics about the role, purpose, and operation of the IESs.

CPA Canada

We believe that IAESB and IFAC can play a significant role in education going forward. The education of our members is a vital factor in ensuring the successful maintenance and development of a profession that operates with integrity and high quality. To that end we believe the IAESB and IFAC would have a much more significant impact if it focused its endeavors on thought leadership and best practice guidance in the education area. Indeed a specific area of focus should be on reviewing best practices throughout the IFAC membership and assisting developing countries improve their education systems in conjunction with the Professional Accountancy Organization Development Committee (PAODC). In reviewing its work plan in consultation with stakeholders the IAESB and IFAC should consider whether the IAESB’s focus should be entirely in this area and not on standard setting.

CPAPNG

Emerging PAOs need strong support to be able to fully comply with IFAC requirements and fulfill the IESs requirements of IAESB. In that regard, Implementation and Guidance support would be highly appreciated.

DTT

The current and future work programs outlined in paragraphs 22, 23 and 24 should be a primary focus of the Board; and we support these as appropriate for a standard setting body. The Board should continue to share, and facilitate the sharing of, good practice in accounting education.

EAA

As documented by previous research (Crawford, L., Helliar, C., Monk, E., Veneziani, M., 2014. International Accounting Education Standards Board: Organizational legitimacy within the field of professional accountancy education, Accounting Forum, 38(1), 67-89), the current public acknowledgement of IESs is limited and they have been also not properly applied from some of the IFAC members. In this framework, the priority seem to make stakeholders interested in the accounting education and aware that IAESB has prepared a lot of effective materials useful for accounting education, including toolkits and interpretation guides. A careful design communication policy may be helpful. This may also sensitize directly the educators involved at different stages.
in the education of future or actual professionals. Obtaining a CPA qualification is, in fact, the results of a long path, that in different jurisdictions embroil differentiated actors. In addition, course instructors may have very differentiated backgrounds, ranging from people with significant professional experience to high-quality researchers with virtual no practical experience in the accountancy field. An effective communication strategy may help course instructors to invest time in being familiar and keeping up-to-date with IAESB’s activity and its material. Moreover, since the learning experience crucially depends on educators, also guidance about how someone is expected to be prepared to provide appropriate educational/learning experiences may be useful.

EYG

There are several areas where we believe the Board could issue implementation guidance or thought leadership publications. These are as follows:

- We believe the Board may consider developing implementation guidance on how the use of specialists relates to the IESs. For example, certain IT competencies may not be required of all professional accountants because they are performed by IT specialists. However, there is a still a need to integrate those specialists into a team, and be able to liaise effectively with them.

- We believe the Board may consider developing thought leadership on learning curriculum architecture. The Board could address how to combine classroom learning, just-in-time (JIT) learning, knowledge and performance support (e.g., enablers) to support professional accountants in an increasingly complex world. The need for a mix of delivery methods is important given the complexity of the accounting environment and the increasing demands placed on professional accountants. We believe that this thought leadership should address the importance of providing a mix of learning to cater to learners having different backgrounds and needs (e.g., one learner may need a quick refresher because it is a subject they have regularly encountered, while another may need a deep dive because it’s the first time they’ve encountered the subject). We also believe the thought leadership could also address the benefits of the different learning methods (e.g., JIT learning provides a learning solution when it is actually needed, rather than potentially some time before it is needed, causing the knowledge to be forgotten before it is used). Additionally, we believe the thought leadership could address the role and importance of performance support in the education of professional accountants (e.g., Performance support materials remove the cognitive load requirement from the learner and places it in a takeaway
that can be used by the learner when needed. The learner then does not have to remember all the
details for performing a complex task, but they have the tools that will enable them to complete the task
when necessary).

- We believe the Board may consider developing thought leadership on how program effectiveness and
assessment of individuals can be combined to support the objectives of the IESs. For example, if you
have an output-based assessment of a program (such as a Kirkpatrick Level 3 or 4 evaluation), you may
be able to follow an input-based approach for measurement of individuals. In other words, if you have
assessed a program as being effective it may be sufficient to have an input-based measure of
attendance to assess an individual.

- We believe the Board may consider developing thought leadership on what elements (e.g., reflection,
critical analysis, assessment criteria, etc.) are necessary for experiential learning and how to support
and manage experiential learning. For example, allocation of people to engagements or activities that
will allow them to apply what they have learned in a recent program, or best practices for engaging with
managers to discuss their role and coaching support on an engagement.

- We believe the Board may consider developing thought leadership on the assessment of the
achievement of learning outcomes through practical experience. The balance between formal learning
and practical experience for CPD means it is impossible to assess competencies through learning based
assessments alone.

FEE

The IAESB has delivered a comprehensive set of education standards and supporting material.

We doubt that further action is required unless IFAC member bodies should call for additional material or
initiatives. The IFAC secretariat could gather recommendations from IFAC member bodies and assess the
need for potential future activities. If such need was identified, the IAESB could come back into action.

In the meantime, it is no longer necessary that the IAESB remains fully operational and we suggest the IAESB
pause its activities.
HKICPA  We support IAESB in its current work on the implementation of the revised IESs. IAESB should work with the IFAC Professional Accountancy Organization Development Committee in identifying areas where assistance may be required and providing the implementation assistance to those professional accountancy organizations in need.

ICAEW  The IAESB should continue with its current work program to support the implementation of the current suite of IESs. A period of stability during which no new IESs will be issued will allow all IFAC members the time needed to implement the revisions. The recently issued IAESB consultation proposing drafting and editing changes to the whole suite of the IESs when PAOs have yet to complete implementation does not provide such a period of stability.

ICAEW believes the Framework should be non-authoritative and should not set out mandatory requirements which IFAC members must meet.

Finally, ICAEW does not support the creation of new work streams or new requirements for professional accountancy organizations (PAOs). We believe the IAESB can and should work collaboratively with the PAOs on a care and maintenance basis.

ICAG  Thought leadership publications should be top on the agenda as they are easily embraced. Also, issuing of implementation guidelines should be frequent so that IESs implementation become easier as well as provide a basis to test for adherence.

ICAP  We suggest only two areas to be focused, namely, (a) Implementation support, and (b) guidance.

ICAS  Where a standard setting board reaches the end of the road in its primary objective, of setting standards, it is highly questionable whether its activities should drift into objectives. We have not seen evidence of the uptake of IFAC implementation support guidance communications and thought leadership publications in the area of
education that would provide us with confidence that this is a role the Board should be undertaking in the absence of standard setting.

ICPAK  As mentioned in (1) and (4) above, we believe that the IAESB should prioritize activities to monitor the implementation of the new and revised IESs and provide support to IFAC member bodies in the implementation of the same.

ICPAU  We agree that the IAESB should continue to provide implementation support especially support structured to support the development of aspiring professional accountants. In addition IAESB can provide thought leadership and contributions in matters affecting accountancy education.

IDW  In our view, a thorough implementation monitoring exercise should be the main focus for the IAESB during the immediate future. Only once the results thereof have been obtained and analyzed should the IAESB add specific projects to enhance existing standards or develop new standards to its work plan. We refer to our response to Question 1.

IFAC SMPC  The SMPC believes that the IESs are important to ensure that different countries apply minimum educational standards and there are similar training curriculums resulting in a common initial level for all professional accountants. We acknowledge that factors such as the qualification and the size of the firm where the practical training is undertaken can result in distinct differences between individuals once they have qualified. In addition, once qualified, depending on how and where the individual is practicing, the gap between different professionals may enlarge. We consider that the employer and the individual professional accountant are best placed to determine their specific CPD needs. Member bodies are also best positioned to be able to react to national developments, for example, the introduction of new accounting standards in a particular sector.

INCP  Como se mencionó anteriormente, IAESB debe ser líder en metodologías de escepticismo profesional y juicio profesional por lo que bien lo podría hacer a través de publicaciones o guías.
Adicionalmente, todos los temas de ética (temas de antisobrono, lavado de activos, corrupción, etc) deben ser de alta prioridad para todos los programas a nivel de contaduría o como requisito de continuo desarrollo de los contadores y de los miembros de IFAC. Por lo anterior, el IAESB debe seguir realizando continuas publicaciones, guías, y comunicaciones en estos temas.

English Translation
As mentioned above, IAESB should be leader in methodologies of professional skepticism and professional judgment so it might well do so through publications or guides.

Additionally, all subjects of ethics (topics of antisobrono, laundering of assets, corruption, etc) should be of high priority for all programs at the level of accounting or as a requirement of continuous development of accountants and members of IFAC. Therefore, the IAESB must continue ongoing publications, guides, and communications on these issues.

Diagram A
Based on IAESB's proposed strategic priorities and activities, we suggest a phased approach in implementation as depicted in Diagram A.

In the initial phase, we suggest that IAESB focus its resources in providing member bodies with guidance materials documenting necessary adoption and implementation support. We also propose that a feedback mechanism be made available for member bodies to share their development or implementation issues, including any difficulties encountered in complying with the revised standards, to facilitate the transformation of their professional accounting education that meets the objectives of the IESs. Subsequently, IAESB could continue to further enhance existing IESs / create new IESs based on such feedback. Once the IESs have been implemented successfully by member bodies, IAESB could consider other initiatives such as “advancing international dialogue and debate on professional accounting education”.

JICPA

The IAESB should focus on activities to promote the adoption and implementation of the IESs. As part of those activities, it should consider the following items as matters of priority.

• Revision of the IEPS
Revision of the IEPS is included in 2014-2016 IAESB Strategy and Work Plan, however, it appears that this revision work had not yet been started. Although it is said in the 2015 handbook that “[T]his handbook does not include the 3 International Education Practice Statements (IEPS) because these pronouncements do not align well with concepts and terminology that are being used in the revised IES,” it is not clear whether the IEPS will therefore be abolished, or whether the plan is to amend them to make them consistent with the revised IESs. While the CP cites the importance of IT competence, it would be better to consider amending IEPS 2 Information Technology for Professional Accountants, rather than creating a new standard for IT competence. This will enable existing resources to be used effectively to address the importance of IT competence in an efficient manner.

Additionally, as mentioned in our comments to Question 3 above, there is an urgent need to amend IEPS 1 Approaches to Developing and Maintaining Professional Values, Ethics and Attitudes to make the
guidelines relating to professional skepticism and professional judgment more comprehensive. As the IEPSSs are important documents that cover specific methodologies for implementing IESs as well as good practice, their revision should be undertaken as a matter of priority.

- Collection of data relating to accounting education systems

The IAESB continues to gather information on accounting education systems across IFAC member bodies, but the sources of the information tend to be limited to the jurisdictions of the IAESB board members. Information needs to be collected more widely and broadly to build up a resource that can be used when deciding whether it is necessary to make additional revisions or develop new standards in future.

**KASNEB-ICPAK**

The other activities the IAESB should prioritize for the period 2017-2021 are:

1. Environmental scan and research on accounting education
2. Implementation support on existing and upcoming IESs
3. Implementation Guidance on existing and upcoming IESs
4. Stakeholder engagements and thought leadership publications

**PWC**

We recommend the prioritization of implementation support, where areas are unclear, including detailed and practical examples and encouraging increased sharing between member bodies.

We also recommend that the Board encourage a dialogue amongst the impacted parties on the emerging issues for the education of professional accountants, including not only technical areas, but also learning trends, learner preferences and innovation.

**SAICA**

The IAESB should continue with its current work program which is principally focused on supporting the implementation of the newly revised IESs. A period of stability during which no new IESs will be issued will allow all IFAC member bodies the time needed to implement the revisions.
We continue to recommend that the IAESB should not create new work streams or requirements for member bodies including the creation of new IESs. The IAESB can support and work collaboratively with the accountancy profession by sharing best practices and addressing guidance to specific challenges in implementation of the revised IES’s.

Villaceran

Perhaps IAESB may publish best practices of the PAOs that achieve significant results in applying the international education standards in their jurisdictions, as a model and encouragement for the rest of the IFAC-member PAOs.

Also, IAESB could perhaps conduct or encourage empirical studies (research, surveys, etc.) to confirm the effectivity of the application of IES. For example, is increasing CPD credit units to 120 from a lower number significantly enhance professional development of CPAs? Studies like these may have a persuasive effect to implementers and regulators and may minimize resistance from constituents.

WPK

First of all, the IAESB should monitor the implementation of the IESs and analyze difficulties member bodies have in implementing the standards. This might lead to additional non-authoritative support and guidance material.

The IAESB should also foster global debate on current and upcoming accounting education top-ics, e.g. through thought leadership publications.

IV. Comments on Other Matters

BDO

We would also support continuing efforts to improve the availability of translations in respect of exposure drafts, consultation papers and final pronouncements.
In the face of the diversifying roles performed by professional accountants and an increasing range of accounting specializations which require distinct forms of learning, it is not enough to simply updating the skills or competence gained during the initial professional development, and professional accountants are now expected to accelerate their efforts to acquire new competence to be able to take on new roles. Since the approach used to update existing competence would be different from the one that will be used to gain new competence, it would be helpful if the contents of the IES 7, for example, are organized into provisions relating to updating existing competence and those for gaining new competence.

Referring to some articles of IFAC as follows:

1. Help the IASB Shape the Future of Financial Reporting, written by Hans Hoogervorst, Chairman, International Accounting Standards Board;
2. The Future of Corporate Reporting - Creating the Dynamics for Change, written by Petr Kriz, President, FEE and Hilde Blomme, Deputy CEO, FEE;
3. The Power of One, written by Anton Colella, Chief Executive, Institute of Chartered Accountants of Scotland, and FEE Cogito Paper-The Future of Corporate Reporting, I would like to propose some comments regarding the Consultation Paper on 2017-2021 IAESB Strategy and Priorities.

The basic thinking of my comments is my paper submitted in the year of 1979 as an attachment of my answer one of the examination of accounting and my thesis in the year of 1982 to get the graduate of Bachelor of Economics Faculty major in Accounting of University of Indonesia.

The motto of my study of accounting in the University of Indonesia is ‘Seek the truth’ that in line with the motto “Quaere Verum”—that is, “seek the truth” as shown in the article of “The Power One” 1).
Mathematical Approach

I absolutely think that the basic of education use the same motto. As we know we apply the accounting since the 14th century by introduction of basic financial reports
– Balance Sheet and Income Statement.
But, unfortunately we did not care to the statement of Professor of Accounting George J. Staubus written in his book as follows:
"The failure of the sum to represent a measure of the value of the whole firm (additivity failure) is a limitation of the accounting that we do not know how to overcome." 2)

We as professional accountants did not care to this statement and its reality till today? Why it has happened?
In my opinion, we as accountants just applying the accounting practices. We do not care to the motto “Quaere Verum”—that is, “seek the truth”. Or maybe someone (Professor of Accounting Yuji Ijiri) has tried to get the truth in accounting, but unfortunately he has not reached the truth yet.

In the mathematic there is assumption of the addition process that: "The sum of two numbers is a unique numbers" and "If equal number be added to equal number the sums are equal number" 2) For example: 5 plus 3 its sum is 8. In the Mathematic, the operation of addition needs the uniqueness of property 3) as Keedy said “the essential property of operation is the uniqueness” 4).
Balance Sheet presents in the measurement assets side the sum of many types of assets for example: Cash, Inventory, Building, Land and so on. As we understand that for Cash item its property of valuation is face value, for Inventory we know many types of valuation methods i.e. LIFO, FIFO and so on, for Building item its property valuation is acquisition or historical cost minus accumulated depreciation.
Balance Sheet only accumulates the total value of money based on the respective

property of each item of assets and liabilities cannot be proofed its mathematical truth.
Accountants have to realize this additivity failure of Balance Sheet and Income Statement that cannot be proofed their mathematical truth. In facing this condition, we have to have a solution that can proof its mathematical truth in line with
the motto “Quaere Verum”—that is, “seek the truth”, even Staubus said "The failure of the sum to represent a measure of the value of the whole firm (additivity failure) is a limitation of the accounting that we do not know how to overcome." It is simple if we want to overcome from the additivity failure in accounting, we only measure item that its value is objective forever and represent the real world phenomena and apply the principle of going concern. What are they? They are cash and liabilities and we do not need Balance Sheet and Income Statement anymore. The other assets are recording as they are and with a simple way. With technology we can create many sub-ledgers of other assets based on public interest need and still show its money value of each transaction if any, but there are no accumulated money value shown in the sub-ledger.

There is no subjectivity in the measurement of cash and liabilities (loan, account payable). All people will know the value of cash only by watching the nominal value shown in it both the paper money and the coin. For the loan, people only see the figure shown in the loan agreement paper especially the loan that applies zero interest rate and for Account payable only see the figure of unpaid invoices.

The Basic Need of All Stakeholders Approach

Here I start with the basic need of all stakeholders both of business entity either non business entity but they are the object of tax levied. We know that all stakeholders of the entity need money from it, employees need wages or salaries, suppliers need payments, creditors need repayment of the loan, government need taxes, investors need cash dividend and so on.

The Solution for the Future Shape of Financial Report

Based on two above approaches, here I want to propose a solution regarding the limitation of the accounting measurement by issuing a New Global Concept of Financial Report. I called it with ‘Cash of The Investor Statement’ with the format as shown at bellow:
QH Corp.

Cash of the Investor Statement For the Year of 2050

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Inflow</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Outflow</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Balance</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Liabilities</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Balance after Liabilities</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Balance after Liabilities</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Corporate Tax</td>
<td>XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash of the Investor/Owner</td>
<td>XXX.XXX.XXX.00</td>
</tr>
</tbody>
</table>

Cash Inflow show all cash received by entity for example from investor or owner, selling the good and services, borrowing from creditor, selling the assets of entity, donation from the third parties and so on;

Cash Outflow show the all payments for example payment of salaries to employees, to management, purchase the goods and services, purchasing of anti pollution equipment, paying training expenses, the repayment or installing of loans, payment of corporate tax and dividend.

Cash balance represents the excess of cash inflow from the cash outflow.

Liabilities including loan, account payable etc.
Cash Balance after Liabilities shows the deduction liabilities from the cash balance. Minimum Income of Investor/Owner is the value stated by the Government represent the minimum cash for the consumption of a family of the investor or owner for individual entity for living during a year multiplied by the total investor/owner.

Tax Basis is the deduction minimum income of investor/owner from Cash Balance after Liabilities. It represents the amount as a basis of corporate Tax levy of the entity. Corporate Taxes is a tax stated by the Government, there is no Corporate Taxes if Tax Basis is zero or a negative balance. Cash of the Investor/Owner shows the total cash available for cash dividend, it reflected the success of the management in performing their tasks to optimal the wealth of the investor/owner. The letter of ‘w’ represents the world currency, in the global economy the economic transactions use the currency accepted in all countries in the world. As long as there is not exists the world currency yet, we can use multiple currencies it shown at below:

QH Corp.
Cash of the Investor Statement For the Year of 2050

<table>
<thead>
<tr>
<th></th>
<th>USD</th>
<th>Euro</th>
<th>Yen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Inflow</td>
<td>XXX.XXX.00</td>
<td>XXX.00</td>
<td>X.XXX.00</td>
</tr>
</tbody>
</table>
| Cash Outflow           | XXX.XXX.00 |        | X.XXX.00 | -/
| Cash Balance           | XXX.XXX.00 | XXX.00 | X.XXX.00 |

<table>
<thead>
<tr>
<th></th>
<th>USD</th>
<th>Euro</th>
<th>Yen</th>
</tr>
</thead>
</table>
| Liabilities            |         |        | X.XXX.00 | -/
| Cash Balance after Liabilities | XXX.XXX.00 |        |        |
| Minimum Income of Investor/Owner |         | XXX.00 | X.XXX.00 | -/
| Tax Basis              | XXX.XXX.00 | XXX.00 | X.XXX.00 |
Corporate Tax XXX.00
Cash of the Investor/Owner XXX.XXX.00 XXX.00 X.XXX.00

The Measurement of Management Performance
In this new concept, we do not use Earning per Share (EPS) to measure the success of management performance anymore. We will use Cash of the Investor per Share (CIPS) to measure it. If Board of Directors rely on the Loan both in term of Short Term either Long Term to fund the operation of the entity and the Cash Balance after Liabilities is negative balance, it means investors pay the creditor/s and they will not received the cash dividend. If Government making a decision the rate of interest is zero, the creditor has no incentive to lend their money and it is better if they invest their money in the business entity instead of as an Idle Money.

The reason why the liabilities are deducted from Cash Balance because it will represents the ability of an entity can produce cash from the operation or from the investor.

This new concept of Financial Report has a correlation with the change a position of Audit Firm in the Economy, the Fiscal policy both domestic either international, the enhancement of internal audit function. We need more time and chance to make explanation of them in other time.

CONCLUSION

The new concept has to be studied and disseminated via Education Program, if it is needed more time to understand it, IAESB can invite me to discuss deeply.

I introduce regarding my-self, my name is Muhammad Sardjono Hadidjaja, a graduate of Economics Faculty major in Accounting of University of Indonesia. I leave in Jakarta, Indonesia.
I was an internal auditor of a state shipping company for 5 years, in this period I also gave a lecture of accounting in some colleges and after resigned from this company I worked as management accountant in the Foreign Oil Company of Indonesia for 22 years and I retired 5 years ago.
Now I am focusing to my idea regarding the Accounting and its problems, it was developed from the year of 1979.
### V Respondents

<table>
<thead>
<tr>
<th>ACRONYM</th>
<th>FULL NAME OF ORGANIZATION</th>
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<tbody>
<tr>
<td>AAT</td>
<td>Association of Accounting Technicians, United Kingdom</td>
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<tr>
<td>ACCA</td>
<td>The Association of Chartered Certified Accountants</td>
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<tr>
<td>AICPA-PcEEC</td>
<td>American Institute of Certified Public Accountants’ Pre-certification Education Executive Committee</td>
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<tr>
<td>ANAN</td>
<td>The Association of National Accountants of Nigeria</td>
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<tr>
<td>BDO International</td>
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<td>EAA</td>
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<td>The Global Accounting Alliance</td>
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<tr>
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<td>Institute of Chartered Accountants of Pakistan</td>
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<td>IDW</td>
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<td>IFAC SMPC</td>
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<td>Eugenio V. Villaceran</td>
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