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Ref.: QMA/PRJ/PWE//MBR

Dear Mr McPeak,

**Re: FEE comments on the IAESB Consultation Paper on the Proposed IES 6 (Revised) Assessment of Professional Competence**

FEE (the Federation of European Accountants) is pleased to provide you below with its comments on the Proposed IES 6 (Revised) Assessment of Professional Competence.

FEE supports the IAESB's project to improve the clarity of its standards including the proposed IAESB revision of IES 6 issued in April 2011.

**Responses to questions**

*Question 1 – Is the change in the scope of IES 6 to assessment across Initial Professional Development (IPD) and Continuing Professional Development (CPD) appropriate?*

FEE agrees with the proposed change. However, we would make the following comments:

- The qualification of a professional accountant remains a break point which makes assessment especially relevant for the attainment of the professional competence. Nevertheless, in a life long learning approach, it is not always easy to decide when IPD ends and CPD starts.
- Paragraph 6 seems to introduce a difference in the objective when using “assess” concerning IPD and “monitor” concerning CPD. This difference also appears in the wording of respectively paragraph 7 on IPD and paragraph 8 on CPD. We note that requirements under IES 7 and ED IES 7 (redrafted) only use the word “assess” with respect to the output-based approach. IES 6 should not have the indirect effect of changing this requirement.

*Question 2 – Does this change accommodate the different approaches taken by professional accounting organizations?*

We believe it does but we have the following observations on the text of the draft:

- In paragraph 7, a reference to paragraph A5 should be added as the topics are consistent.
- It would be useful to split paragraph A4 in examples of assessment activities of IPD and CPD. For example it is difficult to link “self-assessment activities” to IPD or “a review of a portfolio of evidence of completion of workplace activities” to CPD. We can additionally suggest as example of IPD assessment activity, drafting research papers.
- It would be helpful to reintroduce the requirement to assess communication skills as foreseen in the extant IES 6 paragraph 7.

*Question 3 – Are the principles of assessment sufficient?*

Yes, we believe so.

*Question 4 – Is the objective to be achieved by a member body, stated in the proposed revised IES 6, appropriate?*

Yes, we believe it is. However, in the extant IES 6 there was a clear recognition of the joint responsibility of IFAC member bodies and regulatory authorities in the assessment process (reference is made to paragraphs 11/13/14 of the extant IES 6). This situation exists in various EU Member States and should be recognised in revising paragraph 2 of the revised IES 6 or in a separate paragraph under the objective. For instance, article 32.4 of the EU Directive on Statutory Audit states that the system of public oversight shall have the ultimate responsibility for the oversight of the approval and the continuing education of statutory auditors in Europe.

*Question 5 – Have the criteria identified by the IAESB for determining whether a requirement should be specified been applied appropriately and consistently, such that the resulting requirements promote consistency in implementation by member bodies?*

Yes, we believe so.

*Question 6 – Are there any terms within the proposed IES 6 which require further clarification? If so, please explain the nature of the deficiencies.*

In the second sentence of paragraph 2, “In addition, this IES will be helpful to...and any other stakeholders who support the learning and development for professional accountants”, we question whether this standard is useful for such large range of stakeholders. IAESB needs to avoid drafting standards which would go beyond its responsibility. Therefore, we suggest to amend the sentence as follows: “However, this IES might be helpful to educational organisations, employers, regulators and government authorities”.

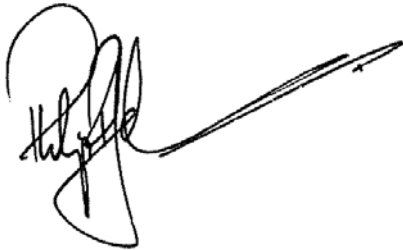
It could be useful to add a reference to paragraph 14 of 2009 revision of the Framework for International Education Standards for Professional Accountants to clarify the meaning of “appropriate level of professional competence” in paragraph A2.

Recognising that this is already mentioned in the 2009 revision of the Framework for International Education Standards for Professional Accountants, FEE believes that it would be useful to include in the Explanatory Materials, the Public Interest as one of the criteria to consider in the definition of assessment. We noticed that the definition of valid assessment in paragraph A10 is different from the wording used in the, paragraph 31 of the 2009 revision of the Framework (“Validity – whether it measures what needs to be measured”).

In paragraph A20, we suggest to clarify the bullet point “objective assessment against a competence map developed by a member body”. Example or best practice could be useful.

For further information on this letter, please contact Ms Petra Weymüller from the FEE Secretariat (email: [petra.weymuller@fee.be](mailto:petra.weymuller@fee.be), Tel.: +32 2 285 40 75).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Johnson', with a long, sweeping horizontal stroke extending to the right.

Philip Johnson  
President