Chartered Institute of Management Accountants - Comments on IES 7 (2.03.11)

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Responses to the three questions posed:

1. Is the objective to be achieved by a member body, stated in the proposed redrafted IES 7, appropriate?

Yes, the objective is appropriate – certainly from our standpoint where we have a well established CPD guidance/support/recording/monitoring programme.

2. 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, the criteria permit sufficient flexibility to allow member bodies to conform, and sufficiently robust to facilitate compliance; however, there will be accompanying resource implications for some bodies. For example, in relation to monitoring and compliance, it may be helpful if the draft or accompanying guidance acknowledged that there are various ways a member body may fulfil their obligations in that particular regard and that providing the "systematic process" adopted is fair, firm and consistent.

3. Are there any terms within the proposed redrafted IES 7 which require further clarification? If so, please explain the nature of the deficiencies.

In A23(b) – "the review and assessment of learning plans or CPD documents in public inspection programs; and/or " It may be helpful to explain the reference to "public inspection programs".