



**The Japanese Institute of  
Certified Public Accountants**

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Technical Manager

International Accounting Education Standards Board

International Federation of Accountants

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**JICPA Comments on the Exposure Draft, *Proposed Revised International Education  
Standard 1, Entry Requirements to Professional Accounting Education***

The Japanese Institute of Certified Public Accountants (JICPA) is pleased to comment on the above-captioned Exposure Draft.

**Request for Comments**

**Question 1**

Is the requirement in Paragraph 7 clear, particularly the concept of “a reasonable chance of successfully completing” balanced with “not putting in place excessive barriers to entry”? If not, what changes would you suggest?

Yes, we believe the requirement in Paragraph 7 is clear, since it explains the contents of the present IES 1 in concrete terms. In addition, the concepts of both “a reasonable chance of successfully completing” and “not putting in place excessive barriers to entry” are also clear with distinct representations compared to the present IES 1.

**Question 2**

Do you envisage any difficulties in complying with the requirements of IES 1? If so, how would you propose addressing them?

Difficulties may arise for member bodies that do not have an authority to set the entry requirements for professional accounting education, and therefore, for when there are

no entry requirements as prescribed in the present IES 1. Those member bodies may have to encourage their regulators to set the requirements of entry into professional accounting education.

### **Question 3**

What is the impact in implementing the requirements of IES 1 to your organization?

Since the JICPA does not have the authority to set the entry requirements, we may need to encourage the regulator to review the current requirements. When the entry requirements are specified, we will be cooperating with the regulator, in both explaining the rationale for the specified entry requirements and making the relevant information publicly available.

### **Question 4**

Are the Explanatory Materials sufficiently clear and comprehensive? If not, what changes do you suggest?

Yes, we believe the Explanatory Materials are clear and comprehensive, since they include sufficient illustrations to help the readers understand IES 1.

### **Question 5**

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

We believe it needs to be revised to reflect the objective of the member bodies in accordance with the drafting conventions. In the exposure drafts IES 4, 6, and 7, the objective was written from the perspective of the member bodies.

### **Question 6**

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 have no objection to the criteria to determine the requirement of the Standard to being: (a) necessary to achieve the objective stated in the Standard, (b) expected to be applicable in virtually all situations to which the Standard is relevant, and (c) unlikely

to have been met by the requirements of other Standards. We agree that the criteria identified by the IAESB promote consistent implementation of requirements by the member bodies.

**Question 7**

Are there any terms within the proposed IES 1 which require further clarification? If so, please explain the nature of the deficiencies.

There are no terms that need further clarification.

Sincerely yours,

Tatsuya Kato

Executive Board Member - CPE

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