

10th September 2015

David McPeak,
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Dear Sir,

Re: IAESB's Guiding Principles for Implementing a Learning Outcomes Approach

AIWMI¹ and CCRA Community² appreciate the opportunity to comment on the IAESB's Guiding Principles for Implementing a Learning Outcomes Approach. CCRA is a specialization which most candidates built upon their existing accounting certification/finance degree, hence we felt we should address some of the issues below.

Executive Summary:

We applaud The International Accounting Education Standards Board™ (IAESB™) for its attempt to improve the implementation of learning outcomes approach (LOA) for programmes.

We have endeavoured to address some of your proposals below, specifically in cases where we think it would help various stakeholders like employers and ultimate customers.

¹**The Association of International Wealth Management of India (AIWMI)** is a not-for-profit organization and a globally recognized membership association for finance professionals with affiliates in around 40 countries. AIWMI primarily focuses on the broad and strategic role of developing a more robust and forward-looking training infrastructure for the financial services sector and to promote more active industry involvement and collaboration in training and continuing education. AIWMI is offering advanced international certification programs along with a wide variety of high-quality executive education programs. AIWMI programs combine state-of-the-art knowledge and skills with practical experience and insights into the functioning of the financial sector. All AIWMI courses and educational events have an intense and pragmatic curriculum. Participants are exposed to the latest developments within the financial services sector. AIWMI plays a key role in guiding the development of the financial services sector. AIWMI works with key industry participants' viz. the Government, the Regulators, the Industries/Associations, the Corporate, the Media and the General Public to achieve its objectives. Besides enhancing technical competence and professionalism in the industry, AIWMI organizes events and facilitates discussions to promote best practices in leadership and talent development in the financial sector with an aim to become Asia's premier center of excellence for financial education. For more info visit www.aiwmindia.com or www.aiwm.org

²**The Certified Credit Research Analyst (CCRA)** is a comprehensive global education program designed to give an expert level understanding of Banking and credit markets to fresh graduates. It integrates the fundamentals of financial analysis, credit and Loan analysis, rating methodologies, credit strategy and structuring. It offers the tools a candidate needs to occupy key positions in the world of finance, private banking, credit ratings and fixed income domain. **The program is offered by AIWMI and NISM (National Institute of Securities Market, A SEBI Body) in India.**

Proposal and Comments

1. What is your view on the Guiding Principles? Specifically, are they helpful in providing a guide for implementing an effective learning outcomes approach?

The Guiding principles are generally helpful for all global stakeholders and would help all involved to understand the depth and rigor of the program and assessment. We agree with the following:

- *Design of programme: Aligned with achievement of LOA*
- *Assessment : Measuring individuals to demonstrate the learning*
- *Governance*

The principles generally have to be derived based on certain objectives/traits expected from such professionals. The traits may include being Ethical, Trust worthy, objective, accountable, putting clients first, competent, treating all with respect. We should make sure these values are instilled in the professional in any field.

2. How do you see the use of these Guiding Principles benefitting your organization, or other organizations with which you are familiar?

The Guiding Principles provide some great directions, however actual implementation is the key. It would be helpful to get some more real time examples. The guidance once finalized and more detailed one would help us analyze our existing systems/methods on where they stand.

3. What additional Guiding Principles do you recommend to support the implementation of a learning outcomes approach?

The whole approach is based on Industry feedback or what we call as practice analysis i.e. constant feedback from the employers on the competencies required and building them in to the curriculum and testing it and constantly improving it.

- *Design*
The whole process of designing will revolve around principles suggested in point no 1. Overall the designing has to provide guidelines on what level of content details are required. For example: For certain knowledge aspects, candidate might just need knowledge of the principle vs. calculation vs. application or vs. synthesis. For e.g. LOA with words like Describe vs. Interpret
- *Assessment :*
Depending on what level of knowledge we define (1-5 or low to high or knowledge to application); the assessment would differ and would change. Certain exams like accountancy are generally based on absolute benchmark like 60% passing vs. others are more relative i.e. percentile. Both methods have their own strengths. Some principles on the same would be helpful.
- *Governance: The oversight process needs to be a continuous process and some insights into how practical that is with the ever-changing complexities would be helpful.*

4. What other areas of implementation guidance would you recommend be developed to support a learning outcomes approach?

We don't have any other recommendations at this point in time.

5. Have you implemented a learning outcomes approach? If yes:

- (a) What recommendations do you have for others yet to implement a learning outcomes approach?

As mentioned in point 3

- (b) Please share an example(s) of your approach – including assessment activities used – which you believe may be useful to assist others implementing a learning outcomes approach.

Details can be seen on <http://www.aiwmindia.com/ccra>

Closing Remarks

IAESB has taken an important step in formulating proposed guiding principles for implementing a learning outcomes approach. AIWMI and CCRA global community appreciates the kind opportunity to comment on these proposed changes.

We hope that IAESB finds the comments useful in analysing/deciding the proposals/framework. We would be very keen to engage further with IAESB via in person meetings or otherwise to present our views.

If you have any further questions or seek clarification, please do not hesitate to contact Biharilal Deora at +91 99308 37335 or Biharilal@aiwmindia.com or Biharilal.deora@gmail.com

Sincerely yours,

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