

21 September 2015

Mr David McPeak
Senior Technical Manager
International Accounting Education Standards Board
International Federation of Accountants
277 Wellington Street West, 4th Floor
Toronto, Ontario
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Canada

Dear David,

**Exposure Draft (September 2015)
International Education Consultation Paper – Guiding Principles for Implementing a
Learning Outcomes Approach**

The Institute of Singapore Chartered Accountants appreciates this opportunity to comment on the International Education Consultation Paper – Guiding Principles for Implementing a Learning Outcomes Approach.

IAESB's approach in providing Guiding Principles and examples for implementation will be extremely useful as we develop and review our professional accountancy qualification programs by adopting a learning outcomes approach. However, we recommend further guidance and clarifications on the Consultation Paper to improve clarity, with an objective of consistency in the standards of accounting education programs offered on a global level.

Our comments on the Consultation Paper are set out in the attachment. If you require any clarification on the comments, please contact Lee Zhen Ni, Manager of Examinations & Qualification at zhenni.lee@isca.org.sg or +65 6704 9837.

Yours faithfully,



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General Comments:

We would like to commend the team for your follow up efforts to provide guidance to IFAC member bodies for implementing a learning outcomes approach. In addition, we noted IAESB's intention to include examples with the final Guiding Principles which will be extremely useful on how the Guiding Principles can be applied. This allows the sharing of experience by IFAC member bodies which have had experience with the adoption of the learning outcomes Approach in professional accounting education with other IFAC member bodies.

However, we would like to suggest further guidance and clarifications to facilitate adoption and implementation.

Comments on Specific Questions

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

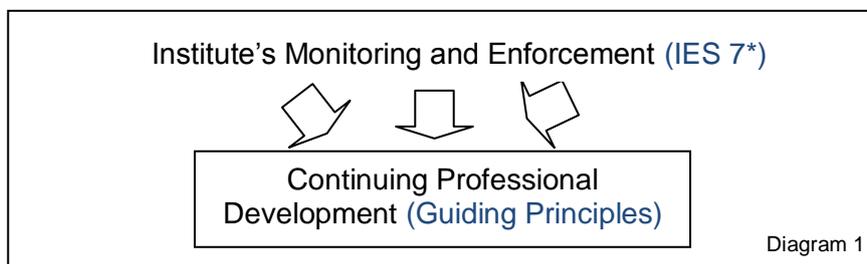
We agree that the elements of the Guiding Principles:

- a) Design of programme to align with achievement of learning outcomes,
- b) Assessment of individuals to measure achievement of learning outcomes and
- c) Governance

form the fundamental basis in providing a guide for implementing an effective learning outcomes approach. We acknowledge that IAESB has developed the Guiding Principles for "broad applicability on a global basis". However, we recommend further elaboration for more effective implementation of the learning outcomes approach by member bodies. Further guidance at an appropriate level of detail will provide clarity, leading to greater consistency in the standards of accounting education programs offered on a global level.

Further comments on Guiding Principle – Assessment activities

We would like to seek further clarification and guidance from IAESB on the applicability of the Guiding Principle (Assessment activities) to short Continuing Professional Development (CPD) courses as this is not the focus of IES 7 [Please refer to Diagram 1]. There is an emphasis on reflective activities (e.g. record of learning, reflective record, or personal development portfolio) in CPD courses which has not been addressed by the Guiding Principle.



**Focus of IES 7 is on the role of the Institute in the monitoring and enforcement of CPD activities undertaken by members to "develop and maintain their competence subsequent to IPD".*

Question 2: How do you see the use of these Guiding Principles benefitting your organisation, or other organisations which you are familiar?

Besides ISCA, these Guiding Principles will be beneficial to the other key stakeholders of the accounting industry in Singapore, including the regulators, relevant government agency, accounting education providers and employers as the “stated learning outcomes and related proficiency levels provide a base that can be built upon to reflect the professional competence needed for a specific role”. In particular, the Learning Outcomes defined in IES 2, 3, and 4 will serve as a common reference in the *design* of programs within Singapore’s accounting education system (from GCE O levels Principles of Accounting course up to the post-university Singapore Qualification Programme) in preparing students and aspiring professional accountants with the necessary knowledge and competence at different levels.

In addition, the use of a common learning outcomes approach in approaching CPD for the Institute and major employers of qualified accountants (including the Big 4), will enhance consistency in terms of the design and pitching of training programs available in the market, bringing about greater efficacy when the Institute undertakes the “monitoring and enforcement role” .

For our suggestions and further clarifications on the Guiding Principles *Assessment Activities* and *Governance*, please refer to our comments in Question 1.

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

With reference to Appendix 1, we suggest the following amendments to the diagram in depicting the Guiding Principles:

- a) Interaction between the three elements of the Guiding Principles as indicated by the 2-way arrows

In practical context, the 3 elements are inter-linked. Organisations have to plan and ensure adequate resources such as competent personnel with relevant skill sets, commitment and support from key stakeholders and time to be committed in implementing the programme, and consistently follow-up on the design of the programme to ensure that the contents are up-to-date, accurate and aligned to achieving the learning outcomes. Organisations also have to dedicate resources to review and ensure that the devised assessment activities are robust enough to measure the achievement of learning outcomes. The design of the programme will determine how the assessment measures are structured.

- b) Inclusion of effective continuous improvement (via regular feedback/review) process

Review considerations on how programs should be evaluated are listed briefly in the Staff Questions and Answers on the Implementation of a Learning Outcomes Approach, Question 21. However, these considerations have not been included into the Guiding Principles outlined in the Consultation Paper, whereby there is only mention on regular evaluation of the three elements (design, assessment and governance) to improve effectiveness, without elaboration of who (i.e. the specific relevant stakeholders) and how (i.e. the guiding methods and principles) to carry out the continuous improvement process.

The outer rim of the diagram in Appendix 1, signifies the continuous improvement aspect, suggests that the feedback/review of the other elements in the guiding principles has to be a continuous and regular process.

c) Focus on the learning outcomes

The purpose of the Guiding Principles is to provide a guide for implementing a learning outcomes approach. The diagram in the Consultation Paper does not explicitly mention the “Learning Outcomes”. To illustrate the focus on learning outcomes, we suggest incorporating “Learning Outcomes” into the diagram in a central position, with 1-way arrows to indicate the relationship with the other three elements (design, assessment and governance).

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

In addition to our comments in Questions 1 and 3, we suggest IAESB to provide more practical guidance in the implementation of governance to CPD courses, in particular the following areas:

a. Extent of oversight

- Does approval of policies and guidelines over CPD programs suffice?
- Is approval by the oversight board required for each short CPD course launched / under regular review?

b. Scope of regular review

We noted from the “Staff Questions and Answers on the Implementation of a Learning Outcomes Approach” that IFAC members are recommended to review programs (including CPD) regularly with a frequency e.g. 3 – 5 years.

- Is regular review applicable to short CPD courses? As CPD courses are generally short (4 hours to 1 day in duration), periodic review of each individual course can potentially be very resource intensive.
- Could member bodies adopt the approach of reviewing such short CPD courses by grouping them into portfolios based on competence areas as identified in IES 2, 3 and 4?

Question 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?

(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.

The accounting education programs administered by the Institute, including the Singapore Qualification Programme has adopted a learning outcomes approach, with inputs from stakeholders from the accounting industry.

In line with the SkillsFuture initiative by the Singapore Government, the new initiatives within the Institute involve the development of a Competency Framework for accounting technicians in Singapore and a new accounting program to address the competency gaps for them.

Based on our experience, please find some suggestions in the use of the Learning Outcomes Approach in developmental work:

Guiding Principle: Design

Know your market

- Collect feedback from relevant stakeholders on the expected competence areas and the level of proficiency required for the target market.
- Involve relevant stakeholders during development.

Guiding Principle: Assessment

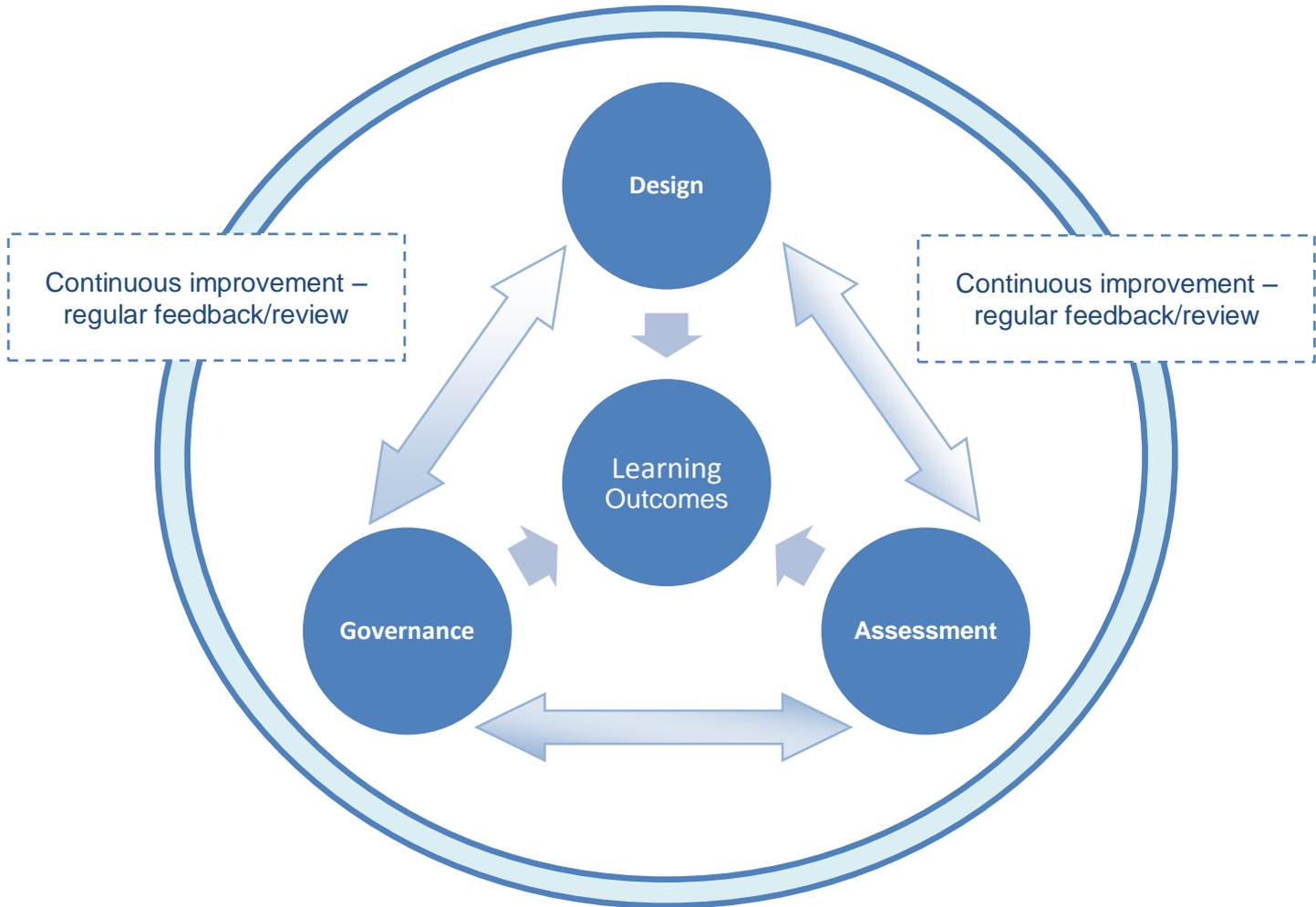
Tailored Assessment Activities

- Involve subject matter experts in development of assessment activities
- Understand the best practices of other professional bodies in equivalent accounting programs

Guiding Principle: Governance

- Oversight board comprising a good mix of relevant stakeholders (including academics and employers)
- Understand the best practices of other professional bodies in equivalent accounting programs

Appendix 1: Proposed revised diagram to depict the elements of the Guiding Principles



Submitted by:
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