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**From:** ICPAR  
**To:** IAESB  
**Subject:** **Comment on Proposed Revised International Education Standard  
IES 5, Practical Experience Requirements for Aspiring Professional  
Accountants**

**Dear Sirs,**

We congratulate the IAESB for the great work that is going on to improve the clarity of its standards and in particular IESs in accordance with its new clarity drafting conventions. We believe this is a timely initiative and we support it.

We here by submit our comments as below:

**Question1**

Do you find that the outcome-based, input-based, and combination approaches offer sufficient alternatives for effectively meeting the standard's requirement for IFAC member bodies to establish their preferred approach to measure practical experience? Paragraph 15 of the Requirements section requires that practical experience be conducted under the direction of a mentor or supervisor.

*We do in principle support a move towards an outcome-based approach. This is so because if we use input-based approach only, this may be subjective / inadequate in the sense that, more hour devoted or time taken for a particular task may not be an indicator of the competence acquired by the accountant.*

*If we have a combination approach then, there is a need to specify at least a minimum for the input; however our concern with the proposal would be that having a variety of permissible approaches may inhibit comparability between the professional associations of different countries.*

**Question2**

In considering the role of the supervisor in directing the aspiring professional accountant's practical experience, the IAESB is proposing to define a supervisor as follows: "is a professional accountant who is responsible for guiding and advising aspiring professional accountants and for

assisting in the development of the aspiring professional accountant's competence." Do you agree with this definition? If not, what amendments would you propose to the definition?

*We think this is a good definition however we don't agree fully, and feel the definition should include the position of the supervisor; i.e is it at the managerial level; operational level or technician level. This is because one may be for a professional accountant but supervising at technician level depending on the size of the firm.*

*Secondly we propose that some of the supervisors to have other skills e.g marketing, leadership skills, this will enable the aspiring professional accountant have rounded skills as work of accountants is dynamic.*

### **Question3**

Are the requirements of IES 5 clear for IFAC member bodies?

*Yes, we think they are in general however there should be at least a stated minimum under input based if we have to ensure consistency. If there is flexibility in one member body then aspiring professional accountants may enroll through one member body with the goal of joining the preferred choice if there was hindrance initially. This opens door to subjectivity as member's bodies may dilute this to one month experience. Is this sufficient?*

### **Question4**

Are the examples and explanation in Explanatory Materials section sufficient in explaining the requirements of the Standard? The proposed IES 5 has also been redrafted according to the guidelines provided in the IAESB Drafting Conventions.

*Broadly yes the examples and explanations are sufficient subject.*

### **Question5**

Is the objective to be achieved by a member body, stated in the proposed revised IES 5, appropriate?

*We approve of the objective, however this is an issue which is debatable depending on which side one is looking at coupled with the state of the economy of the member body and consequently the demand for professional accountants in that economy.*

### **Question6**

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?

*With issues like:*

*"IFAC member bodies shall establish their preferred approach to measure practical experience using one of the following three approaches" output-based; input-based; or a combination of input-based and output-based approaches.*

*There can never be consistency if the requirements are established by member body on their preferred approach as preference cannot be consistent.*

*We don't see how the proposals which allow more flexibility can do anything except increase inconsistencies between member bodies. Some may under the proposals adopt an input based route, others an output based and others a combination. Maybe this is not bad thing given local variations on the ground situations but the real test will be how the overall process is overseen. If it is left to individual bodies to develop and implement their own approaches, then does IFAC have plans to compare different approaches and test them for robustness or is that to be left to self-regulation like the SMOs generally? If so, it will only be as good and consistent as the member body's own Quality Control processes allow it to be.*

**Question7**

Are there any terms within the proposed IES 5 which require further clarification? If so, please explain the nature of the deficiencies.

*We require further clarification on the following words*

- *Mentor and supervisor are they the same*
- *Work-log under the output based should be linked to the objective to be achieved*
- *Cooperative education needs amore elaboration*