

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

Accountant

Commentary individual

Rio de Janeiro / Brazil

Sir

Chair and Steering Committee

The Technical Director

International Public Sector Accounting Standards Board

International Federation of Accountants

277 Wellington Street West

Toronto, Ontario M5V 3H2 CANADA

stepheniefox@ifac.org.

08 August, 2014

IPSASB Strategy Consultation 2015-2019

I'm Denise Juvenal this pleasure to have the opportunity to comment on this consultation. This is my individual commentary for IFAC-IPSASB about IPSASB Strategy Consultation 2015-2019.

Questions for Respondents

1. Do you agree with the IPSASB's tentative view on its strategic objective for the period from 2015 forward? If not, how should it be revised?

Yes, I agree with the IPSASB's tentative view on its strategic objective for the period from 2015.

2. Do you think that the two outcomes identified are appropriate for achieving the strategic objective? If not, what outcomes do you think are more appropriate?

Yes, I think that the two outcomes identified are appropriate for achieving the strategic objective.

3. Do you think that the outputs identified will assist in achieving the outcomes? If not, what outputs do you think the IPSASB should focus on?

Yes, I think that the outputs identified will assist in achieving the outcomes.

4. What changes to feedback mechanisms should the IPSASB make to ensure it is fully informed about the views of its stakeholders?

I think that for the IPSASB the principal feedback has relation with the Internal Control and the Governance for application in the Public Sector, because the activities are very complex and the governance is very difficult considering the political decisions in the budget.

However, I understand that the mechanisms have direct relation with transparency when I describe which the principles the public sector needs to apply. In this fact, transparency and mechanisms methods need to work together for reduce the complexity of laws of public sector around the world.

I do not know if the IPSASB should make to ensure it fully informed about views of its stakeholders, but I understand that the IPSASB need to know what aspects of the implementation of IPSAS in each country that accept use them.

Although, The IPSAS are the principal point for development in the public sector high quality of transparency and public interest, if the public sector does not implement with high quality, the IFAC/IPSASB could have problems for application of international standards for public sector around the world.

Finally, I agree with this proposal, but, I suggest for the board, if agrees, that consult the key international regulators (OECD¹, CIPFA², IASB³, IFAC⁴, G20⁵, IVSC⁶, FRC⁷, EUROSTAT/European Commission⁸ and ESMA⁹) in relation what are

¹ <http://www.oecd.org/gov/regulatory-policy/ria.htm> and <http://www.oecd.org/gov/budgeting/ipsasb-governance-review.htm>

² <http://www.ifac.org/publications-resources/international-framework-good-governance-public-sector>

³ <http://www.ifrs.org/Alerts/Governance/Documents/2014/IPSASB-Review-Response-April-2014.pdf>

⁴ <http://www.ifac.org/publications-resources/definition-public-interest>

⁵ http://www.b20australia.info/Documents/20140123_B20_MediaRelease_Davos_B20%20supports%20G20%20agenda%20FINAL.pdf and <http://www.pm.gov.au/media/2014-06-22/g20-leaders-encouraged-drive-economic-growth>

⁶ <http://www.ivsc.org/content/ivsc-releases-valuation-proposals-investment-property>

⁷ <https://www.frc.org.uk/Our-Work/Publications/Professional-Oversight/Consultation-Documents/Regulation-of-Auditors-of-Lo.pdf>

⁸ http://epp.eurostat.ec.europa.eu/portal/page/portal/government_finance_statistics/documents/1_EN_ACT_part1_v5.pdf

⁹ <http://www.esma.europa.eu/content/Keynote-Speech-AFME-Post-Trade-Conference-reform-financial-markets-halfway-there-Steven-Maij>

mechanisms for reduce the problems in the application of IPSAS around the world and the implementation of the governance for the public sector.

5. Do you agree with the five key factors the IPSASB considers in deciding to initiate a project and assessing its priority? Are there other factors you think should be considered?

Yes, I agree with the five key factors the IPSASB considers in deciding to initiative a project and assessing its priority. No, I think that there are not other factors should be considered.

6. Do you think the Cash Basis IPSAS is a valuable resource in strengthening public finance management and knowledge globally by increasing the adoption of accrual-based IPSASs?

Yes, I think that the Cash Basis IPSAS is a valuable resource in strengthening public finance management and knowledge globally by increasing the adoption of accrual-based IPSASs.

7. Of the three options identified in relation to the Cash Basis IPSAS, which would you recommend the IPSASB select? Please provide the rationale for your recommendation.

I think that the option “a” identified in relation Cash Basis IPSAS, “(a) Retain the Cash Basis IPSAS and complete the review project using existing IPSASB resources; this would mean issuing an ED that addresses the Task Force’s recommendations, analyzing responses and finalizing a revised Cash Basis IPSAS.”

8. Considering the various factors and constraints, which projects should the IPSASB prioritize and why? Where possible please explain your views on the description and scope of the project.

Projects to Address Public Sector Specific Issues	Observations
Biological assets held for the provision or supply of services	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Heritage assets	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Infrastructure assets	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.

Intangible assets – public sector specific	I think that this is important considering the new focus in measurement. I understand that intangible assets is very complex for public sector, however I consider the importance of this project. I suggest for the board, if agrees, The European Commission legislation and in practice relating to: EuSEFs and the EaSI ¹⁰ for this proposal, I do not know if have direct impact, so, I think that can improve this discussion.
Measurement – public sector specific	I think that this is important considering the new focus in measurement. I understand that measurement is very complex for public sector, however I consider the importance of this project. I suggest for the board, if agrees, The European Commission elaborated the Quality of Service Measurement ¹¹ and The Fair Value Option ¹² .
Military assets	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Natural resources	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Non-exchange expenses	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Role of government as owner rather than government	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Sovereign powers and their impact on financial reporting	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Trust funds	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Projects to Maintain Existing IPSASs	Observations
Borrowing Costs IPSAS	I think that this is important considering the Borrowing Costs IPSAS ¹³ . In this moment this

¹⁰ http://ec.europa.eu/internal_market/social_business/docs/expert-group/social_impact/140605-sub-group-report_en.pdf

¹¹ http://ec.europa.eu/internal_market/post/activities/qualitymeasurement_en.htm

¹² http://ec.europa.eu/internal_market/accounting/docs/arc/2005-07-08-ias39-fair-value-option_en.pdf

¹³ <http://www.ifac.org/news-events/2008-09/ifacs-ipsasb-proposes-modifications-borrowing-cost-accounting>

	project has great points in the IASB ¹⁴ and in the European Commission ¹⁵ prepared Economic Review of the Financial Regulation Agenda, these observations can improve this discussion.
Construction Contracts IPSAS 11	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Disclosure of Financial Information about the General Government Sector IPSAS 22	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Employee Benefits IPSAS 25	I think that this is important considering the Employee Benefits IPSAS 25. The GASB elaborated discussion about this subject ¹⁶ and Pensions Plans ¹⁷ .
Improvements to IPSAS 23 Non-Exchange Revenues	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Leases IPSAS 13	I think that this is important considering the Leases IPSAS 13. The IASB includes new information for Leases ¹⁸ , I do not know if have some impact for this project.
Presentation of Financial Statements IPSAS 1	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Related Party Transactions IPSAS 20	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Revenue IPSAS 9	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Segment Reporting IPSAS 18	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Projects to converge with IFRS	Observations

¹⁴ <http://www.ifrs.org/Current-Projects/IASB-Projects/IFRS-1-Borrowing-costs>

¹⁵ http://ec.europa.eu/internal_market/finances/docs/general/20140515-erfra-working-document_en.pdf

¹⁶ http://www.gasb.org/cs/BlobServer?blobkey=id&blobnocache=true&blobwhere=1175828897160&blobheader=application%2Fpdf&blobheadername2=Content-Length&blobheadername1=Content-Disposition&blobheadervalue2=1433297&blobheadervalue1=filename%3DED_-_Accounting_%2526_Financial_Rptg_for_Postemployment_Benefits_Other_Than_Pension_%2528Employer_ED%2529.pdf&blobcol=urldata&blobtable=MungoBlobs

¹⁷ http://www.gasb.org/cs/BlobServer?blobkey=id&blobnocache=true&blobwhere=1175828897172&blobheader=application%2Fpdf&blobheadername2=Content-Length&blobheadername1=Content-Disposition&blobheadervalue2=819833&blobheadervalue1=filename%3DED_-_Financial_Rptg_for_Postemployment_Benefit_Plans_Other_Than_Pensions.pdf&blobcol=urldata&blobtable=MungoBlobs

¹⁸ <http://www.ifrs.org/Current-Projects/IASB-Projects/Leases/Pages/Leases.aspx>

Extractive Industries (IFRS 6 interim standard but no comparable IPSAS)	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Insurance Contracts (IFRS 4 interim standard but no comparable IPSAS)	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Non-current Assets Held for Sale and Discontinued Operations (IFRS 5 but no comparable IPSAS)	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Rate Regulated Industries	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Other Projects	Observations
Differential Reporting	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.
Integrated Reporting	I think that Integrated Reporting is very important. I know that the IFAC elaborated work with CIPFA for public sector. I understand that this point needs to observe the internal control for public sector.
Interim Financial Reporting	I think that this project could be in future. I agree with proposal of IFAC/IPSASB in this discussion.

Thank you for opportunity for comments this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

5521993493961