

September 17, 2014

IAESB Technical Director
International Accounting Education Standards Board
International Federation of Accountants
529 Fifth Avenue 6th Floor
New York, NY 10017

This letter on behalf of the Pre-Certification Education Executive Committee (PcEEC) of the American Institute of Public Accountants (AICPA) is in response to the IAESB's request for comments on the Proposed Framework for International Education Standards (2014).

The PcEEC is a standing committee of the AICPA responsible for policy-setting in the area of pre-certification education and has a mission of building a bridge between the academic community and the accounting profession.

We, the PcEEC, have carefully considered content of the Proposed Framework for International Education Standards (2014). We commend the IAESB and its board members for the revised framework. The following items are in response to the IAESB's request for specific comments:

Question 1: The IAESB is proposing to include the following definition of professional accountant in the updated Framework.

"A professional accountant is an individual who achieves, demonstrates, and maintains professional competence in accountancy and who is bound by a code of ethics."

Is the definition of a professional accountant appropriate for users of the IESs? If not, please explain.

Response: The definition of professional accountant is appropriate for users of the IESs.

Question 2: The IAESB is proposing to include the following definition of general education in the updated Framework.

“General education is a broad-based education through which fundamental knowledge, skills, and attitudes are developed.”

Is the definition of general education appropriate for users of the IESs? If not, please explain.

Response: The definition of general education is appropriate for users of the IESs.

Question 3: The extant Framework is an authoritative pronouncement, meaning it establishes requirements for which IFAC member bodies must comply. Because the proposed draft of the Framework does not include any requirements and its primary purpose is to describe the learning concepts underpinning the IESs, the IAESB is proposing the revised Framework be non-authoritative. Do you agree with this change? If not, why?

Response: The requirements bestowed upon IFAC members in the 2009 Framework have been removed from the 2014 Framework. The resultant 2014 Framework merely describes concepts. As a result, we agree the revised Framework should be non-authoritative.

Question 4: Is the updated Framework clear and easy to understand? If not, please explain.

Response: The 2014 Framework is clear and easy to understand.

Question 5: Does the updated Framework appropriately align with the recently revised IESs? If not, what gaps or differences should be addressed?

Response: The 2014 Framework effectively aligns with the revised IESs.

Question 6: Are there any other terms within the Framework which require further clarification? If so, please explain the nature of the deficiencies.

Response: We have not observed any other terms within the Framework which require further clarification.

Question 7: Are there any other learning concepts relevant to the IESs that should be added to the Framework? If yes, please describe the concepts that should be added.

Response: We believe learning concepts relevant to the IESs are adequately addressed in the revised Framework.

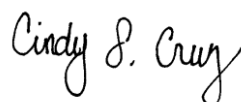
In summary, the 2014 revision aligns the Framework's language with that used in the revised standards accomplished over the last few years. We believe the IAESB has performed a significant service by revising the Framework.

Finally, we are pleased to see retention of the section/paragraphs relating to IFAC Member Bodies and IFAC SMO's as they relate to the IESs.

Respectfully,



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IAESB Board Member



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