

COMMENTS OF CA RAMACHANDRAN MAHADEVAN  
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The IAESB is seeking comments **only** on changes resulting from applying the clarity drafting conventions and their effect on the content of IES 7. In particular, you are asked to respond to the following questions:

1. Is the objective to be achieved by a member body, stated in the proposed redrafted IES 7, appropriate?

YES

2. 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?1

YES

3. Are there any terms within the proposed redrafted IES 7 which require further clarification?

If so, please explain the nature of the deficiencies.

In Output Based approaches,  
Demonstration by way of outcome  
Requires clarification Re the word –OUTCOME

Para 12 speaks about evidence.  
The word evidence can be used instead of outcome

Para A12 uses the words  
Outcome or competence  
Hence the word competence be used.

Outcome is equal to competence and if so why the word outcome?

In Para a 13 the word outcome is not used  
Hence the word evidence can be used instead of outcome

Output-based approaches—by requiring professional accountants to demonstrate, by way of outcomes, that they develop and maintain professional competence

The IAESB welcomes comments on all matters addressed in this proposed redrafted IES 7. Comments are most helpful when they refer to specific paragraphs, include the reason for the comments and, where appropriate, make specific suggestions for any proposed changes to

wording to enable the IAESB to fully appreciate the respondent's position. If you agree with the proposals in the exposure draft, it will be helpful for the IAESB to be made aware of this view.

### **Comments on Other Matters**

**New Addition to the Glossary\* is not required for the following reasons}--**

**IES 7 title clearly mentions Life Long Professional Development  
From entry as a student till death.**

**There is no Final or Complete Professional development.**

**Member bodies can assess the professional development while  
Upgrading membership from Associate (Entry Level) to Fellow(senior Level)**

**\*Proposed Conforming Amendments**

### **IAESB Glossary of Terms**

Add:

**Initial Professional Development** Learning and development through which individuals first develop competence leading to performing the role of a professional accountant.

### **Developing Nations**

Recognizing that many developing nations have adopted or are in the process of adopting the IESs, the IAESB invites respondents from these nations to comment, in particular, on any foreseeable difficulties in applying IES 7 in a developing nation environment.

In this electronic communication age, mandating physical attendance at locations specified /conducted by the professional body creates enormous difficulties for professionals staying and practising away from cities.

Attendance at any IFAC professional body or affiliate learning program globally should be reciprocated by member bodies

### *Translations*

The IAESB welcomes comments from respondents on potential translation issues noted in reviewing this exposure draft.

IAESB should mandate that translation should be done in the languages in which

Examination is being conducted for qualifying as professional in each country or

Under each body