



29th May 2019

John Stanford
Technical Director
International Public Sector Accounting Standards Board
277 Wellington Street West
Toronto Ontario M5V 3H2
Canada

Dear John,

**IPSASB Exposure Draft 67 – Collective and Individual Services and Emergence Relief
(Amendments to IPSAS 19)**

The Institute of Certified Public Accountants of Kenya (ICPAK) welcomes the opportunity to comment on the proposed amendments to IPSAS 19 - Collective and Individual services and Emergence Relief.

Please find below the responses which we have provided to the questions raised in the Exposure Draft.

Kindly contact us using the details below should you require any additional information or clarification; cliff.nyandoro@icpak.com Tel: +254 721 578 138.

CPA Cliff Nyandoro

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Specific Matter for Comment 1:

Do you agree with the definitions of collective services and individual services that are included in this Exposure Draft?

If not, what changes would you make to the definitions?

Response: ICPAK agrees with the definitions of collective services and individual services as included in Exposure Draft 67 although we believe it would provide more clarity if a listing for examples of the services implied is provided.

Specific Matter for Comment 2:

Do you agree that no provision should be recognized for collective services?

If not, under what circumstances do you think a provision would arise?

Response: We agree that no provision should be recognized for collective services since such services are considered ongoing activities of a public sector entity that delivers them.

Specific Matter for Comment 3:

Do you agree that no provision should be recognized for individual services?

If not, under what circumstances do you think a provision would arise?

Response: We agree that no provision should be recognized for individual services since the delivery of individual services represents ongoing activities of the public sector entity that provides the services. The delivery of individual services results in the public sector entity incurring expenses and acquiring resources through exchange transactions. Such exchange transactions would be accounted for in accordance with other relevant IPSAS.

Specific Matter for Comment 4:

Do you agree with the proposed accounting for emergency relief?

If not, how do you think emergency relief should be accounted for?

Response: ICPAK agrees with the proposed accounting for emergency relief. We are in agreement that a provision should be recognized in circumstances where emergency relief is provided in response to specific emergencies that require a separate decision to be made by a government or public sector entity. Where the criteria for recognizing a provision are not met, an entity would consider whether the disclosure of a contingent liability will be necessary.

We also agree that where delivery of emergency relief is comparable to the delivery of collective and/or individual services, then no provision is recognized by an entity where delivery of such services is considered as part of its ongoing activities.