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Individual Commentary

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**IES 5, Practical Experience Requirements for Aspiring Professional
Accountants**

I'm Denise Juvenal this is pleased to have the opportunity to comment on this consultation for IES 5, Practical Experience Requirements for Aspiring Professional Accountants, this is my individual commentary for International Accounting Education Standards Board – IAESB/IFAC.

Guide for Respondents

Question 1: 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.

In this moment, I think that is adequate principally because have many modifications in relation a rules, laws and standards around the world, but I understand that in the future will be integrated with others situations, this issue is some similar as IES 1 in the point A6-A11.

Question 2: 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?

No, I think that the supervisor can be making confuse in relation a practical experience, is very difficult to define and described experience, in this case I think that the supervisor will be the commission of accountant's for decided about development of the aspiring professional accountant competence.

Question 3: Are the requirements of IES 5 clear for IFAC member bodies?

The Explanatory Materials section provides further explanation on the Scope and Requirements of IES 5.

I think that requirements is clear but I have doubt in relation the function of mentors for example, the IES needs have mentors for that? This point isn't clear because I think the board members need in the future knowledge others cultures, rules and jurisdictions because have many new proposals of studies in accounting and auditing.

This point is very important if the members integrated more control in the countries when applied this standard, so the function of mentor, as inspection or direction of continued of quality of application in countries as responsibility and transparency.

Question 4: 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.

Yes, the examples and explanation in explanatory materials sections sufficient in explaining the requirements of the standard.

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

Yes, the objective is achieved by a member body, is adequate.

Question 6: 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?

I think that in this moment the criteria are identified for IAESB for determining whether a requirement, but the specific applied appropriately and consistently depends each result in the implementation and inspection for guaranteed high quality of the standards in jurisdiction around the world.

Question 7: Are there any terms within the proposed IES 5 which require further clarification? If so, please explain the nature of the deficiencies.

I observed that the point that I suggested must be verify is related a master point A8 I think that as this point is very important included for more clear what's IAESB considering relevant subject for in the future don't have questions in relation a definition about input-based approach.

Comments on Other Matters

Translations - Recognizing that many respondents intend to translate the final IESs for adoption in their own environments, the IAESB welcomes comment on potential translation issues noted in reviewing the proposed IES 5.

The translations have to make for Institutes of Audit of the countries with authorization from IFAC - IES.

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 the proposed IES 5 in a developing nation environment.

I agree, but I think that is very important the Associations of Accountants to integrated of the opinion and send for IFAC-IES your comments about process of adopting for this issue.

Effective Date - Recognizing that proposed IES 5 is a revision of extant IES 5, the IAESB believes that an appropriate effective date for the standard would be 12-15 months after approval of the final revised standard. The IAESB welcomes comment on whether this would provide a sufficient period to support effective implementation of the final IES 5.

If the effective date for IES for financial statements for periods ending on or after December 2013, I don't know if is time for date, must be considered for observations for ethical in the education and your application for universities.

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

Best Regards,

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