

Joint comments, French professional bodies, CNCC and CSOEC, on Revised IES 4 – 31/10/2012

IAESB

Proposed International Education Standard (IES 4) Initial Professional Development – Professional Values, Ethics, and Attitudes (Revised)

Introduction

The two French professional bodies representing auditors, « **Compagnie Nationale des commissaires aux comptes** » (CNCC) and professional accountants, « **Conseil Supérieur de l'Ordre des Experts-comptables** » (CSOEC) welcome this consultation launched by the IAESB on its set of Education standards, and more particularly on the Revised International Education Standard n°4 “Initial Professional Development – Professional Values, Ethics, and Attitudes”. They both bring their support to the outcomes-based approach adopted by the IAESB in the Revised IES 4.

Through this position letter, both bodies would like to first give their answers to the “requests for specific comments”, aimed at collecting the respondents’ opinions on significant issues related to the approach taken by the IAESB regarding technical competences and then also give some comments on the explanatory material part.

Answers to questions “Request for specific comments”

1 The IAESB recognizes the importance of a consistence approach across the IESs, and is proposing to adopt a tabular format for requirements related to learning outcomes which is applied consistently across IESs 2, 3, 4 and 8. This tabular format is set out in paragraph 11, Table A of the proposed IES 4 Exposure Draft (June 2012).

Question 1. Do you agree with the tabular format adopted for learning outcomes?

Yes, the CNCC and the CSOEC agree with this approach.

Question 2. Do you agree with the competence areas identified for ethics education?

Yes, the CNCC and the CSOEC agree with the competence areas identified for ethics education.

Question 3. Do you agree with the minimum levels of proficiency as identified for each competence area?

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The CNCC and the CSOEC do not agree with the “Intermediate” level of proficiency. The minimum level should be “Advanced” because immediately after the IPD period including the training period, an aspiring professional accountant may become a full member and also be licensed for auditing activities.

Question 4. Do you agree that the learning outcomes related to professional skepticism and professional judgment identified are appropriate for ethics education?

Yes, the CNCC and the CSOEC agree with these learning outcomes.

2 Appendix 1 of the proposed IES 4 Exposure draft (June 2012) provides a description for each of the four classifications of proficiency to help IFAC member bodies set learning outcomes for professional accounting education programs. Examples of indicative verbs under each level of proficiency are also included to assist those who wish to develop additional learning outcomes. Appendix 1 is common to the proposed IESs 2, 3 and 8, which also focus on learning outcomes, so the descriptions provided focus beyond technical competence, relating to all aspects of professional competence.

Question 5. Does Appendix 1 of the proposed IES 4 Exposure Draft (June 2012) provide adequate clarification to assist in the interpretation of the learning outcomes that are listed in Paragraph 11 of the proposed IES 4 Exposure Draft (June 2012)? If not, what changes do you suggest?

Yes.

But IES 2, 3 and 4 have the same appendix. As it has not a prescriptive content but aims only to clarify concepts, would it not be preferable to move this appendix as an appendix of the Framework instead of duplicating it?

3. The proposed IES 4 Exposure draft (June 2012) has also been redrafted according to the guidelines provided in the IAESB Drafting Conventions, and in order to provide a high level on consistency across the IESs which address the learning outcomes for aspiring professional accountants.

Question 6. Are there any terms within the proposed IES 4 Exposure Draft (June 2012) which require further clarification? If so, please explain the nature of the deficiencies?

The term “Reflective Activity” used in § 13 and explained at § A 30 to A 34 needs further clarification. More practical examples would be helpful.

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Question 7. Do you anticipate any impact or implications for your organization, or organizations with which you are familiar, in implementing the new requirements included in this proposed IES 4 Exposure Draft (June 2012)?

Yes.

The competence area “Commitment to the public interest” should be developed in the French accounting curriculum.

The relations between ethics and morale, if introduced in IES 4, should be also introduced in the French curriculum.

The two French professional bodies should keep this objective in mind for the next revision of the curriculum.

Other comments

§ 11 Table A : Suggestions

(b) Ethical principles

(i) Explain the nature of ethics: add one item: “Difference between ethics and morale”.

(c) Commitment to the public interest

(i) Explain the role of ethics within the profession and in relation to the concept of social responsibility: add: “and to the concepts of morale”.

Appendix

IES 2, 3 and 4 have the same appendix. As it has not a prescriptive content but aims only to clarify concepts, would it not be preferable to move this appendix as an appendix of the Framework instead of duplicating it?