

Mr. David MCPeak
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The President

Correspondent	Our reference	Your reference	Date
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Dear Mr MCPeak,

Re: Comments on IAESB Proposed Framework for International Education Standards (2014)

The *Belgian Instituut van de Bedrijfsrevisoren – Institut des Réviseurs d'Entreprises* (IBR-IRE) thanks the International Accounting Education Standards Board (IAESB) for its invitation to answer to the IAESB Proposed Framework for International Educational Standards (2014).

General comments

Proposed Paragraph 29 defines "**IPD**" as "*learning and development through which aspiring professional accountants first develop professional competence leading to performing a role of a **professional accountant***". In Proposed Paragraph 11, the IAESB defines a professional accountant mainly in terms of an individual achieving, demonstrating, and maintaining **professional competence** in accountancy. In Proposed Paragraph 18, "Professional competence" is defined as the ability to perform a role to a defined standard (in fact: the integration and application of (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes).

Proposed Paragraph 23 defines "Learning and development" as an "*ongoing process of developing and maintaining professional competence throughout the career of a professional accountant*". Whilst Proposed Paragraph 12 defines an "**aspiring professional accountant**" as "an individual who has commenced a professional accounting education program as part of Initial Professional Development ("IPD")." This last definition is circular, as it comes back to the definition of an "IPD" which happens to be based on the definition of a "professional accountant". Therefore, we suggest to define an "**aspiring professional accountant**" as

"an individual who has commenced a professional accounting education program as part of a process of learning and development related to performing the role of a professional accountant (this way, the definition is no longer circular and is based on the earlier definitions of "professional accountant" and "learning and development process".

Proposed Paragraph 33 is key in emphasizing that CPD is directed at the continuance of professional accountants to performing their roles competently.

Answers to questions from the Exposure Draft (ED)

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?

Yes. But the definitions in paragraphs 29 and 12 are circular (see general comments above), a problem which can easily be solved.

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.

Yes.

Question 3: As indicated in the IAESB's Terms of Reference, the Board's authoritative documents are those pronouncements that are subject to due process for their development (See DUE PROCESS AND WORKING PROCEDURES—March 2010 for IAESB's due process).

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?

Yes, we agree. IBR-IRE considers frameworks indeed to be of a more "generic" nature, and do not have the authoritative powers of IESs.

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

Yes, except for the circular definition referred to above.

Question 5: Does the updated Framework appropriately align with the recently revised IESs (See <https://www.ifac.org/sites/default/files/publications/files/Handbook-of-International-Education-Pronouncements-2014.pdf>)? If not, what gaps or differences should be addressed?

We have no comment.

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

No.

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.

Not to IBR-IRE's knowledge.

Please do not hesitate to contact us should you need any further information.

Yours sincerely,

Daniel KROES
President