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Proposed International Education Standard (IES) 4

Initial Professional Development - Professional Values, Ethics, and Attitudes (Revised)

October 11, 2012

We are Denise Juvenal and Manuel López are pleased to have the opportunity to comment on this consultation of the Proposed International Education Standard (IES) 4 Initial Professional Development - Professional Values, Ethics, and Attitudes (Revised) of the IFAC/IAESB.

Guide for Respondents

Request for General Comments

The IAESB welcomes comments on all matters addressed in this proposed International Education Standard 4 (See Appendix 1 of the proposed IES 4 Exposure Draft (June 2012)). 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. Where a respondent agrees with proposals in the exposure draft (especially those calling for a change in current practice), it will be helpful for the IAESB to be made aware of this view.

Request for Specific Comments

The IAESB is particularly interested in comments on the matters set out below:

1. The IAESB recognizes the importance of a consistent approach across 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, we agree with the tabular format adopted for learning outcomes and we consider that these points are integrated with the proposal of Global Regulatory Convergence and Accountancy Profession¹ and Evaluating and Improving Internal Control in Organizations² elaborated for IFAC. We suggest for the board, if agree, that observed the results of discussion of The Committee of Sponsoring Organizations of the Treadway Commission - COSO about internal control³.

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

Yes, we agree with the competence areas identified for ethics education, but, in future can be need integrated more informations considering the results of discussions elaborated for IFAC principally or others regulators that development international standards.

¹ https://www.ifac.org/sites/default/files/publications/files/PPP6-Global-Regulatory-Convergence_0.pdf

² <https://www.ifac.org/sites/default/files/publications/files/Evaluating%20and%20Improving%20Internal%20Control%20in%20Organizations%20-%20Updated%207.23.12.pdf>

³ <http://www.ic.coso.org/default.aspx>

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

Yes, we agree with the minimum levels of proficiency as identified for each competence area, but, in future can be need integrated more informations considering the results of discussions elaborated for IFAC principally or others regulators that development international standards.

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

Yes, we agree that the learning outcomes related to professional skepticism and professional judgment identified are appropriate for ethics education. We suggest for the board, if agree, observed the discussion about Single Market elaborated for European Commission⁴, can be that the results of discussion increase some important decisions for ethics education.

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.

Questions 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?

We agree with Appendix 1 of the proposed IES 4, for this moment the clarification is adequate but not consider that in future can be changed or increase some points, because actually has some discussions that can or not modified this proposal, we do not know.

⁴ http://ec.europa.eu/commission_2010-2014/barnier/headlines/news/2012/10/20121004b_en.htm

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 of 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?

There aren't any terms with the proposed IES 4 Exposure Draft for further clarification.

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)?

None.

Thank you for opportunity for comments this proposal; if you have questions do not hesitate contact to us, rio1042370@terra.com.br and mrejonlopez@gmail.com.

Yours Sincerely,

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