



National Association of State Boards of Accountancy

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February 6, 2019

International Accounting Education Standards Board
International Federation of Accountants
545 5th Avenue, 14th Floor
New York, NY 10017

Via e-mail to: davidmcpeak@iaesb.org

Re: Exposure Draft dated December 2018 – Proposed Revisions to IESs 2,3,4 and 8 –
Information and Communication and Professional Skepticism

Dear Members of the International Accounting Education Standards Board:

We appreciate the opportunity to offer comment to the International Accounting Education Standards Board (IAESB) on the Exposure Draft dated December 2018 – Proposed Revisions to IESs 2,3,4 and 8 – Information and Communication and Professional Skepticism.

The National Association of State Boards of Accountancy's (NASBA) mission is to enhance the effectiveness and advance the common interests of the Boards of Accountancy that regulate all certified public accountants and their firms in the United States and its territories.

In furtherance of that objective, we offer the following comments on the Exposure Draft structured around questions outlined in the Request for Specific Comments.

Question 1: Do you support the proposed revisions to learning outcomes related to the areas of Information Communications & Technologies (“ICT”) and Professional Skepticism provided in Appendices A, B, C and D? If not, what changes would you suggest?

NASBA is supportive of the changes in learning outcomes regarding ICT and professional skepticism. We believe the learning outcomes regarding ICT and professional skepticism were well thought out, and the changes are both timely and necessary.

We have one comment regarding IES 3, learning outcome (a) (iii). With respect to identifying when it is appropriate to consult with others to reach an informed conclusion, changing the word “specialist” to “others” is too general. The standard needs to communicate that it is important to consult with a specialist or someone who is knowledgeable about the relevant issue.

Question 2: Are there additional ICT and professional skepticism learning outcomes that you would expect from aspiring and professional accountants?

Yes. All the learning outcomes related to professional skepticism focus on applying a questioning mindset and making appropriate judgments. It is also important for the professional accountant to create supporting documentation and provide an informative record of the work performed, conclusions reached, and the basis for those conclusions.

Question 3. Do you support the new definitions of Information and Communications Technologies, Intellectual Agility, and Professional Judgment added to the IAESB Glossary of Terms? If not, what changes would you suggest?

We are supportive of the new definitions. Further, we are supportive of the additional professional skill that a professional accountant should demonstrate, intellectual agility.

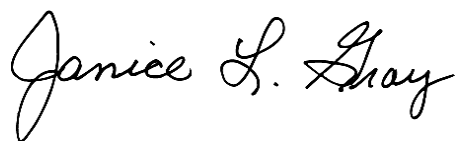
Question 4. Are there any terms within the new and revised learning outcomes of IESs 2,3,4, and 8, which require further clarification? If so, please explain the nature of the changes?

Some clarification of what “curiosity” is meant to cover might be helpful (see page 24 of the exposure draft). In IES 4 Paragraph 11 Table A “Learning Outcomes for Professional Values, Ethics and Attitudes” (a)(ii) it states “Demonstrate curiosity by exploring beyond what is immediately apparent.” The explanation given is “A new learning outcome is included to recognize the importance of curiosity when applying professional skepticism.” Is “curiosity” defined someplace that is more specific than “exploring beyond what is immediately apparent,” which could cover many things?

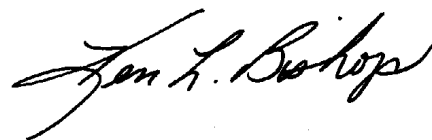
In our opinion, the other terms within the new and revised learning outcomes of IESs 2,3,4 and 8 seem clear.

NASBA would like to commend the members and staff of the International Accounting Education Standards Board for initiating a discussion about Continuing Professional Development and an output-based approach to CPD. We appreciate the opportunity to comment on the Exposure Draft.

Sincerely,



Janice L. Gray, CPA
Chair



Ken L. Bishop
President & CEO