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Senior Technical Manager  
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Dear Senior Technical Manager,

The American Institute of CPAs (AICPA) is pleased to comment on the IFAC exposure, *Proposed IFAC Member Body Compliance Program Strategy 2011-2014*.

We applaud the Compliance Advisory Panel's (CAP) effort to provide a work plan and timeline to the *Terms of Reference (TOR)* approved by the IFAC Board in September 2008 for future CAP activities. These activities continue to enhance the Member Body Compliance Program and meet the expectations of the Public Interest Oversight Board (PIOB) in its oversight of CAP, as an important public interest activity committee (PIAC) within IFAC.

In reviewing the proposed Vision, Values and Goals we raise a significant concern about the introduction of a new concept in these provisions that is not supported by the *TOR* nor the *Statements on Membership Obligations (SMOs)*. The CAP exposure proposes the concept of "adoption" of international standards in numerous references throughout these sections on pages 8 & 9. The current benchmark for member bodies in implementing international standards is Best Endeavors. The IFAC Board did nothing in its September 2008 *TOR* to change the Best Endeavors expectation for member bodies, nor the convergence tone this standard suggests. Adoption is not mentioned in the current *TOR* nor *SMOs*. We consider the introduction of adoption as a major change in policy that would require approval by IFAC Council, considering the impact on member bodies.

The new concept of "adoption" suggests that member bodies and/or their country's governments should turn over their role in standard-setting for the profession to international groups without question. We submit that this approach is not acceptable in current international and national political environments. Therefore, CAP should not require IFAC member bodies to achieve a level that is not practical nor realistic, setting up the Member Body Compliance Program for failure.

We feel strongly that the current Best Endeavors goal with its convergence objective is currently working and should continue without any further consideration of elevating this benchmark to total adoption. Please note that the AICPA supports international standards and believes in adoption as an ultimate goal, but requiring adoption at this time is unrealistic. This would create a situation where most member bodies would be in violation of the IFAC Compliance Program and would continue in violation for the foreseeable future.

Thank you for the opportunity to comment on this important exposure, and we appreciate your consideration of our concern.

Sincerely,

Susan S. Coffey, CPA  
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