Recommended Practice Guideline

Financial Statement Discussion and Analysis
This document was developed and approved by the International Public Sector Accounting Standards Board (IPSASB).

The objective of the IPSASB is to serve the public interest by setting high-quality public sector accounting standards and by facilitating the adoption and implementation of these, thereby enhancing the quality and consistency of practice throughout the world and strengthening the transparency and accountability of public sector finances.

In meeting this objective the IPSASB sets International Public Sector Accounting Standards (IPSASs) and Recommended Practice Guidelines (RPGs) for use by public sector entities, including national, regional, and local governments, and related governmental agencies.

IPSASs relate to the general purpose financial statements (financial statements) and are authoritative. RPGs are pronouncements that provide guidance on good practice in preparing general purpose financial reports (GPFRs) that are not financial statements. Unlike IPSASs RPGs do not establish requirements. Currently all pronouncements relating to GPFRs that are not financial statements are RPGs. RPGs do not provide guidance on the level of assurance (if any) to which information should be subjected.

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# FINANCIAL STATEMENT DISCUSSION AND ANALYSIS

## CONTENTS

<table>
<thead>
<tr>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective</td>
</tr>
<tr>
<td>Status and Scope</td>
</tr>
<tr>
<td>Definition</td>
</tr>
<tr>
<td>Identification of Financial Statement Discussion and Analysis</td>
</tr>
<tr>
<td>Presenting Financial Statement Discussion and Analysis</td>
</tr>
<tr>
<td>Content of Financial Statement Discussion and Analysis</td>
</tr>
<tr>
<td>Overview of the Entity’s Operations and Environment</td>
</tr>
<tr>
<td>Information about the Entity’s Objectives and Strategies</td>
</tr>
<tr>
<td>Analysis of the Entity’s Financial Statements</td>
</tr>
<tr>
<td>Risks and Uncertainties</td>
</tr>
</tbody>
</table>

Appendix A: Terms in this RPG Defined in IPSASs

Basis for Conclusions
Objective

1. This Recommended Practice Guideline (RPG) provides guidance for preparing and presenting financial statement discussion and analysis. Financial statement discussion and analysis will assist users to understand the financial position, financial performance and cash flows presented in the general purpose financial statements (hereafter referred to as “financial statements”).

Status and Scope

2. The reporting of information in accordance with this RPG represents good practice. An entity preparing and presenting financial statement discussion and analysis is encouraged to follow this RPG. Compliance with this RPG is not required in order for an entity to assert that its financial statements comply with International Public Sector Accounting Standards (IPSASs).

3. Financial statement discussion and analysis should be presented at least annually and should use the same reporting period as that covered by the financial statements.

4. The reporting boundary for financial statement discussion and analysis should be the same as that used for the financial statements.

5. Financial statement discussion and analysis should be issued with the financial statements.

6. This RPG is applicable to all public sector entities other than Government Business Enterprises (GBEs).

7. Financial statement discussion and analysis should not be described as complying with this RPG unless it complies with all the requirements of this RPG.

8. In some jurisdictions, preparation and presentation of financial statement discussion and analysis is a legislative or regulatory requirement, or required by other externally imposed regulations. Entities are encouraged to disclose information about the impact of such requirements on compliance with this RPG.

Definition

9. The following term is used in this RPG with the meaning specified:

Financial statement discussion and analysis is an explanation of the significant items, transactions and events presented in an entity’s financial statements and the factors that influenced them.

Terms used in this RPG with the meanings specified in International Public Sector Accounting Standards (IPSASs) are set out in Appendix A.

Identification of Financial Statement Discussion and Analysis

10. Financial statement discussion and analysis should be clearly identified, and distinguished from the financial statements and from other information.

11. Separate identification of financial statement discussion and analysis enables users to distinguish:

(a) Financial statements prepared and presented under the accrual basis of accounting in accordance with IPSASs;

(b) Financial statement discussion and analysis prepared in accordance with this RPG; and
FINANCIAL STATEMENT DISCUSSION AND ANALYSIS

(c) Other information presented in an annual report or other document that may be useful to users but is not the subject of requirements in IPSASs or recommendations in RPGs (but could be the subject of guidance in other RPGs).

12. Financial statement discussion and analysis should identify the financial statements to which it relates.

Presenting Financial Statement Discussion and Analysis

13. Financial statement discussion and analysis provides information useful to users for accountability and decision-making purposes by enabling users to gain an insight into the operations of the entity from the perspective of the entity itself. It also provides the opportunity to reflect the entity's interpretation of significant items, transactions and events affecting the financial position, financial performance and cash flows of the entity. Therefore, financial statement discussion and analysis complements the information in the financial statements.

14. Information in financial statement discussion and analysis should meet the qualitative characteristics of financial reporting taking into account the constraints on information included in general purpose financial reports (GPFRs) \(^1\).

Content of Financial Statement Discussion and Analysis

15. The content of financial statement discussion and analysis should be consistent with the financial statements and the underlying items, transactions and events, as well as assumptions such as those relating to recognition and measurement.

16. Financial statement discussion and analysis should include the following, without merely replicating information in the financial statements:

(a) An overview of the entity's operations and the environment in which it operates;
(b) Information about the entity's objectives and strategies;
(c) An analysis of the entity's financial statements including significant changes and trends in an entity's financial position, financial performance and cash flows; and
(d) A description of the entity's principal risks and uncertainties that affect its financial position, financial performance and cash flows, an explanation of changes in those risks and uncertainties since the last reporting date and its strategies for bearing or mitigating those risks and uncertainties.

17. The form and specific content of an entity's financial statement discussion and analysis should reflect the nature of the entity and the regulatory environment in which it operates.

18. Where financial statement discussion and analysis includes information that is also in the financial statements, it should not merely repeat what is in the financial statements, but should analyze and explain how items, transactions and events affect the entity's financial position, financial

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\(^1\) The qualitative characteristics of financial reporting are relevance, faithful representation, understandability, timeliness, comparability and verifiability. The constraints on information are materiality, cost-benefit and the balance between the qualitative characteristics. See Chapter 3 of the *Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities* for further details.
performance and cash flows. Financial statement discussion and analysis should include cross-references to the financial statements where appropriate to avoid duplication of information.

Overview of the Entity’s Operations and Environment

19. An overview of the entity helps users to understand the entity’s operations and how the environment in which it operates affects its financial statements. This information assists users’ understanding of an entity’s financial statements. Information provided about an entity’s operations in financial statement discussion and analysis may include current information, and changes from the prior period, relating to:

(a) The entity’s mission and vision;
(b) The entity’s governance (e.g., legislative or regulatory structure, management structure);
(c) The entity’s relationships with other entities, with a focus on relationships that could significantly affect the entity’s financial position, financial performance and cash flows (e.g., funding arrangements);
(d) External trends, events and developments in the legal, regulatory, social, political and macro-economic environment specific to the entity, which have or may have a significant impact on the entity’s financial position, financial performance and cash flows (e.g., the impact of events in international markets on employment, the tax base, or interest rates); and
(e) The entity’s main operations, including service delivery methods (e.g., outsourcing, service concession arrangements) and significant changes in them.

Information about the Entity’s Objectives and Strategies

20. Financial statement discussion and analysis should discuss the entity’s objectives and strategies relating to its financial position, financial performance and cash flows in a way that enables users of the financial statements to understand the entity’s priorities and to identify the resources that must be managed to achieve these objectives and strategies. For example, such objectives and strategies could include managing surplus/deficit, and managing the levels of debt and reserves. Financial statement discussion and analysis should explain how achievement of the entity’s objectives would be measured and over what time period progress would be measured.

21. Financial statement discussion and analysis should discuss significant changes in an entity’s objectives and strategies from the previous period or periods.

Analysis of the Entity’s Financial Statements

22. Financial statement discussion and analysis should include an analysis of significant changes and trends in an entity’s financial position, financial performance and cash flows. An analysis of trends includes those financial statement items that are important and significant to gaining a better understanding of an entity’s financial position, financial performance and cash flows and changes in financial position, financial performance and cash flows over a period of time.

23. Financial statement discussion and analysis should describe the significant items, transactions and events that have affected the financial position, financial performance and cash flows, without simply reiterating the information presented in the financial statements. Judgment is required in identifying the significant items, transactions and events.
24. If information from the financial statements has been adjusted for inclusion in financial statement
discussion and analysis, that fact should be disclosed along with the nature of and reasons for the
adjustments. When financial performance measures are derived from the financial statements,
those measures should be reconciled to measures presented in the financial statements that have
been prepared in accordance with IPSASs.

25. Comparative information should be disclosed for amounts presented in financial statement
discussion and analysis when it is relevant to an understanding of the current period’s financial
statement discussion and analysis.

26. When an entity is required or elects to make its approved budget(s) publicly available, IPSAS 24,
*Presentation of Budget Information in Financial Statements* requires a comparison of budget and
actual amounts in the financial statements. IPSAS 24 also requires an explanation of material
differences between the budgeted and actual amounts and permits an entity to disclose this
information either in the notes to the financial statements or in other public reports. When an entity
elects to include this information in its financial statement discussion and analysis, it should apply
the guidance in IPSAS 24 to these disclosures.

**Risks and Uncertainties**

27. Financial statement discussion and analysis should discuss the entity’s principal risks and
uncertainties that affect its financial position, financial performance and cash flows and include an
explanation of how this relates to the objectives and strategies of the entity. This information would
help users to evaluate the impact of those risks in the current period (e.g., contingent liabilities
disclosed in the financial statements or the use of foreign currency hedges to mitigate risk) as well
as expected outcomes.

28. The principal risks and uncertainties can be external or internal risks; any description of these risks
and uncertainties should cover exposures to both negative consequences and potential
opportunities.

29. A discussion of how the entity manages its risks and uncertainties helps users obtain a faithful
representation of the entity’s exposure to risks that directly affect financial statement items, which
allows them to evaluate the entity’s financial position, financial performance and cash flows. Such
disclosure may include the entity’s decision to “self-insure” in respect of some risks, or to mitigate
risk by transferring or sharing it through insurance.

30. A discussion of these risks and uncertainties would provide relevant information to users about
exposure or vulnerability to concentrations of risks such as significant loans to particular regions or
industries, or dependence on a particular source of revenue.

31. Risks and uncertainties that affect the financial position, financial performance and cash flows may
have a pervasive effect on the financial statements. Therefore, information relating to these risks
and uncertainties may be reported separately, or in relevant sections throughout financial statement
discussion and analysis.
## Terms in this RPG Defined in IPSASs

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>Approved budget</td>
<td>The expenditure authority derived from laws, appropriation bills, government ordinances, and other decisions related to the anticipated revenue or receipts for the budgetary period.</td>
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<td>Government Business Enterprise</td>
<td>An entity that has all the following characteristics:</td>
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<td></td>
<td>(a) Is an entity with the power to contract in its own name;</td>
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<td></td>
<td>(b) Has been assigned the financial and operational authority to carry on a business;</td>
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<td></td>
<td>(c) Sells goods and services, in the normal course of its business, to other entities at a profit or full cost recovery;</td>
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<td></td>
<td>(d) Is not reliant on continuing government funding to be a going concern (other than purchases of outputs at arm’s length); and</td>
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<td>(e) Is controlled by a public sector entity.</td>
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Basis for Conclusions

This Basis for Conclusions accompanies, but is not part of, RPG 2.

Background

BC1. The IPSASB approved a project in March 2008 to address “narrative reporting”. In developing this RPG, the IPSASB clarified that the scope of the project was to address only those reports that provide discussion and analysis specifically relating to an entity’s general purpose financial statements (“financial statements”) as set out in IPSAS 1, Presentation of Financial Statements and not broader types of reports that may be considered general purpose financial reports as envisaged in the IPSASB’s Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities (the Conceptual Framework). The IPSASB considers that it is important to provide narrative information related directly to the financial statements since this provides useful information for accountability and decision-making by users of financial statements.

BC2. In undertaking this project, the IPSASB considered, under its Process for Reviewing and Modifying IASB Documents, whether to develop guidance that was converged with Management Commentary, an IFRS Practice Statement. The IPSASB did not consider this approach to be appropriate because the users identified in the Practice Statement are investors whereas Chapter 2 of the Conceptual Framework identifies different users, which results in different information needs related to the financial statements. On this basis the IPSASB decided it was important to develop guidance on financial statement discussion and analysis specific to the public sector. Financial statement discussion and analysis assists users of public sector entities’ financial statements by complementing and supplementing the financial statement explanations with insights and perspectives.

BC3. Financial statement discussion and analysis is intended to address similar matters to reports that may be termed “management discussion and analysis” and “management commentary” in various jurisdictions. However, the IPSASB did not consider those terms to accurately describe the nature of the report in relation to the financial statements. The IPSASB decided it was important to link financial statement discussion and analysis to the financial statements because financial statement discussion and analysis is intended to explain the financial statements, and not to stand alone. The IPSASB considers the term “financial statement discussion and analysis” clearly defines the scope of applicability of this RPG and its close linkage to the financial statements.

Exposure Draft 47, Financial Statement Discussion and Analysis

BC4. The IPSASB developed Exposure Draft (ED) 47, Financial Statement Discussion and Analysis which was issued in March 2012. This ED proposed that entities that prepare and present their financial statements in accordance with IPSASs should be required to prepare financial statement discussion and analysis. This meant that financial statement discussion and analysis would have the same level of authority as accrual-based IPSASs even though it related to a GPFR.

BC5. In developing the ED the IPSASB considered that financial statement discussion and analysis provides additional information necessary to meet the objectives of financial statements. Furthermore, the IPSASB considered that the benefits of providing financial statement discussion and analysis would outweigh the costs of preparing it, as the
information is used in the preparation of the financial statements, and tailored to the specific circumstances of the entity. The IPSASB therefore proposed that financial statement discussion and analysis should be prepared by all entities that prepare their financial statements in accordance with IPSASs.

BC6. Some respondents to the ED raised the concern that entities might not be able to assert compliance with IPSASs applicable to the financial statements if they did not follow the proposed requirements in the ED (if issued as an IPSAS). In particular, respondents were concerned that financial statement discussion and analysis might still be considered to be a part of the IPSAS reporting framework even though the ED explicitly stated that financial statement discussion and analysis is not a component of the financial statements. Some of these respondents suggested that this would not be an issue if the ED was developed into non-authoritative guidance, e.g., a Recommended Practice Guideline (RPG).

BC7. The IPSASB considered whether the ED should be developed as an IPSAS or an RPG. The IPSASB considered this issue in the context of whether or not authoritative pronouncements could be developed for GPFRs, an issue on which members had varying views. The IPSASB noted that the scope of its Conceptual Framework is not limited to general purpose financial statements.

BC8. Respondents to the ED were split on this issue with a slight majority favoring the material not becoming an IPSAS. Of those not in favor of issuing an IPSAS, the majority of respondents expressed a clear view that it should be issued as guidance similar to the proposed RPG Reporting on the Long-Term Sustainability of an Entity’s Finances.

BC9. As a well-established area of GPFRs, an authoritative pronouncement on financial statement discussion and analysis would help entities meet the accountability objective of financial reporting since it would enable users to gain an insight into the operations of the entity from the perspective of the entity itself. Financial statement discussion and analysis is an explanation of the financial statements but is not part of the financial statements and therefore it is not required for the fair presentation of the financial statements.

BC10. On balance the IPSASB decided that the ED should be developed into an RPG. The IPSASB considers that this RPG provides useful guidance for entities and its flexible application could benefit entities in jurisdictions that have local requirements or regulations. It will also promote comparability across entities that present financial statement discussion and analysis. Furthermore, the IPSASB considers that the RPG might encourage entities that are not accustomed to presenting financial statement discussion and analysis to provide users with this information.

BC11. Because financial statement discussion and analysis contributes to meeting the accountability objective of financial reporting, the IPSASB decided that it should consider the authority of this pronouncement on financial statement discussion and analysis in the future.

Forward-Looking Information

BC12. The IPSASB considered whether it should recommend that an entity disclose forward-looking information, such as forecasts. The IPSASB acknowledged concerns that in some jurisdictions providing forward-looking information might be seen as signaling political intent or committing a public sector entity to certain future actions. In addition, whether forward-looking information can be included in financial statement discussion and analysis will vary
depending upon the regulatory and budgetary reporting environment in which the entity operates. Some members expressed the opinion that not including forward-looking information could have an impact on the ability of financial discussion and analysis to support decision-making of users and therefore its inclusion should be recommended. However, on balance the IPSASB decided not to recommend that an entity disclose forward-looking information, though such information may be provided if an entity so chooses.

Implementation Guidance and Illustrative Examples

BC13. ED 47 included Implementation Guidance on qualitative characteristics, and illustrative examples of information about the entity’s financial statements and variances and trends. The IPSASB decided to delete the implementation guidance and illustrative examples on the basis that entities preparing financial statement discussion and analysis should focus on the guidance in the RPG. Moreover, the IPSASB observed that best-practice examples are available from other sources.