

## Detailed Analysis of Respondents' Comments on Exposure Draft

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## I. General Statements of Support of Note

### Respondent's Comment

- AAT AAT is pleased to have the opportunity to respond to the proposed IAESB Strategy and Work Plan and continue to be committed to providing as much useful input to these consultation opportunities as possible.
- AICPA-PcEEC We have carefully considered the content of the strategy and work plan in context to the stated mission of the IAESB and the global economic environment. We commend the IAESB and its board members for the development of the strategy and work plan and its excellent work with respect to standard setting.
- CGA-Canada CGA-Canada takes this opportunity to congratulate the IAESB on the successful revision of the suite of International Education Standards (IESs) that has been undertaken over the past two years. This is indicative of the robust and dynamic global environment in which the IAESB functions and that drives the need to update and maintain the currency of standards for professional knowledge, skills, values, ethics and attitudes of the accountancy profession.
- FEE FEE commends the IAESB for having reflected on its core reason for existence, higher purpose and mission.
- The IAESB's primary work as standard setter for professional accounting education was central to fulfill its mandate to enhance the competence of professional accountants. Developing IES 1 – 8, the IAESB has created principles for professional accounting education worldwide. The revision of IES 1 – 8 started in 2009 was important to enhance the clarity of the standards and FEE has contributed to all related exposure drafts.
- SAICA SAICA commends the significant work done to date by the IAESB in the clarification project through the revision and redrafting the International Education Standards (IES's).
- SAICA would also like to commend the IAESB on the considerable thought that has gone into drafting this strategy and work plan.

## II. **General Statements of Concern and Related Matters for Consideration** **Respondent's Comment**

Staff Comment  
(where  
necessary)

### i) **Cease or Suspend Proposed IAESB's Activities and Projects**

ICAEW ICAEW has significant concerns with the IAESB's proposed strategy and work plan and we cannot support it in the form presented.

We believe that the natural limit of the IAESB's useful work has already been reached with the publication of IES 1 – 7 and near completion of IES 8. We judge that there is no compelling educational case for authorising significant new waves of work. And in a time of austerity, and given the need for all organisations to manage within ever-tighter budgets, we conclude that in there is no strong business case either to justify the investment of considerable additional resources.

The proposed strategy appears to be predicated on the assumptions that the IAESB should push forward with a particular work-stream because it features on the existing schedule and that additional work-streams should be proactively identified and added. This approach overlooks that times and priorities change and that a viable strategy for future times must look at what can be reduced or stopped as well as what can be continued or initiated.

ICAEW's views on this matter accord with the views of the GAA, as expressed to IAESB and the PIOB in Stephen Harrison's letters of September 2012, June 2013 and September/October 2013. The amount of new and continuing work that is envisaged by the IAESB proposed work plan is not justified and is sharply at variance with the message from the ICAEW and the GAA that the IAESB should be placed on a care and maintenance basis, or formally mothballed.

We would urge the IAESB to rethink its plans and to very significantly curtail its proposed plan of work for the next three years.

CAI As a starting point we would like to acknowledge the significant progress that has been made by the IAESB under its rewriting of the education standards. The bulk of this work is now largely complete. We also note in the context of current global economic challenges the continued demand for resources by IFAC to meet its public interest commitments. Given that the IES revision program is nearly complete we would propose that:

- The work on the revision of IES 8 be fast tracked;
- The proposed project regarding the definition of the term Professional Accountant has implications beyond the responsibilities of the IAESB and probably should be undertaken by specific task force appointed by the IFAC Board; and
- In relation to the proposed other proposed development work we suggest that these are not priority activities and consideration be given to whether the full PIAB processes are needed for these activities. Such actions would we believe free up additional resources to support the work of the other IFAC public interest boards.

GAA The eleven member bodies of the GAA constitute some of the largest members of IFAC and are amongst the oldest and most developed of the world's professional accounting organizations. Together we are responsible for meeting around 45% of IFAC's member body dues. This makes us conscious of the responsible balance between aspirations, expenditure and income.

We are also very conscious of the significant output and efforts of all of those who have supported the IAESB to date.

We are fully committed to acting in the public interest and have thought carefully about the proposals

contained in the Work Plan. In this context we have previously expressed some of our thinking when we wrote to the Chairman of the IAESB in September 2012, and to the Chairman of the PIOB in June 2013.

We note that the exposure draft covers both the completion of the current work program and a proposed future work plan.

In summary the early revision of IES 8 is supported. We suggest that the other components of the 2014-2016 work plan are not a high priority or at least that this work should not be pursued by the resource demanding processes of a PIAB. We believe strongly that IFAC must recognize the resource constraints under which it has to operate and prioritizes accordingly. We believe that in this context IFAC is best advised to redirect its resources away from the IAESB by either dismantling the Board or mothballing it for a defined period, in consultation with the PIOB; concentrating resources available on what we firmly believe are more important - Ethics and Auditing. Compliance can be left to the CAP and capacity building to the PAOD committee. Contracting out/outsourcing is also an option.

AICPA-  
PcEEC We believe the IAESB's essential function will be completed at the conclusion of standard setting and that the activities and projects of the strategic plan marked as "committed" and "targeted" should be put on hold indefinitely.

We believe the IAESB has done an exceptional job revising the Framework and IESs and making them more principles-based. We believe the IAESB should finish that process with the revision of IES 8. However, we also believe that further IAESB endeavors should be put on hold. We feel the IAESB is a standard setting body that will have accomplished its mission at the conclusion of revising the standards.

HKICPA The GAA has been in communication with the IFAC Board on the future activities of IAESB before and during the consultation period for this exposure draft.

The HKICPA views on the proposals in the exposure draft are clearly expressed in the letter submitted by the GAA on 10 September 2013

FEE The completion of the revision project foreseen for 2013/2014, should have an impact on the IAESB's primary work and its overall mandate. According to the information provided about the IES revision project on the IAESB's website, the IAESB does not envision developing new IESs, which we support. A period of stability during which no new IESs will be issued will allow IFAC member bodies the time needed to implement the revisions.

Therefore, once this core work of the IAESB is completed in 2013/2014, it should pause its activities.

CPA Canada CPA Canada supports the standard setting role of the IAESB and believes that the IAESB has done excellent work in developing education standards to guide and direct PAOs in the establishment of high quality programs for the initial and ongoing development of professional accountants. In an environment with unlimited resources, the IAESB's plan to focus on support mechanisms to encourage and assist in the implementation of these standards is a reasonable aspiration. However, the resource constraints of IFAC **must be considered in** when developing priorities. We believe that, over the next few years, the work of other standards boards, in particular Ethics and Auditing, will need to take precedence. While implementation guidance and support, advocacy and compliance for the education standards are important initiatives, we believe these objectives can be accomplished through other mechanisms.

SAICA We are unable to support the IAESB 2014 – 2106 work plan in its current form.

As a significant amount of work has been put into revising and redrafting the Education Standards, we are of the view that IFAC member bodies require some time to analyze the implications of these changes and implement its own response to implementation of these standards. We believe that a more effective way of monitoring the implementation needs to be investigated. This need not be undertaken by the IAESB and we believe that are many more effective ways of implementing the strategy the IAESB has developed.

The draft strategy and work plan is extensive and would require the investment of significant resources. We reiterate our suggestion that IFAC and the IAESB to consider what resources it has available and to prioritize the projects outlined in the work plan based on the availability of such resources. Prioritization should also include looking at more effective ways in which some of these projects can be completed.

ii) **Continue Proposed IAESB Activities and Projects**

AAT With regard to the proposed strategy, we particularly endorse the aim of supporting and providing guidance to facilitate the implementation of the revised IESs. It is important that these documents demonstrate the value added to organizations and are treated as working documents, rather than running the risk of being viewed as the result of a bureaucratic paper based exercise and going unused. This will be especially crucial for nations where the adoption of global standards is in its infancy; through further work on implementation, IFAC and IAESB should be able to clearly and quickly add practical value.

ACCA ACCA is generally satisfied that the overall direction of the IAESB 2014 - 2016 Strategy and Work Plan is appropriate given the recent updating of the education standards, the focus has moved on to promoting their adoption and implementation.

ANAN We have carefully reviewed the exposure draft on **2014-2016 IAESB Strategic and Work Plan** and in our opinion, the proposed strategy and work schedule has been planned to capture the focused areas. However, We feel that the exposure draft could be improved.

We are at alert and ready to key into the implementation stages of the three strategic priorities starting from Q2 2014 to 2016 relating to:-

- Establish and develop IES and pronouncements.



- Engage stakeholders and promote the adoption and endorsement of the revised IESs.
- Support and provide guidance to facilitate the implementation of the revised IESs.

BDO We also agree with the three strategic priorities set out in paragraph 18. In our opinion, the engagement of stakeholders to promote the adoption and endorsement of the revised IESs is critical to their success and that of the IAESB. The stakeholder group, as defined in paragraph 21, should also be widened to include entities and also the general public given the perception of the accounting profession as a whole.

CGA-Canada We are in full support of the proposed Strategy and Work Plan 2014-2016 of the IAESB which will guide implementation of the revised IESs. The interest of IFAC member bodies and other stakeholders will be served best by giving momentum to immediate implementation of the revised IESs.

The strategic priorities outlined in the Strategy and Work Plan for 2014-2016 should lay a strong foundation for member countries to accelerate implementation of the revised IESs which we believe will lend itself to global convergence and the mobility of professional accounts, in addition to serving the public interest. Accordingly, CGA-Canada supports the objectives of the exposure draft.

CICPA Basically, we support and agree with this plan. From the current revisions of the IESs, new revisions will be more principle-based and more universally applicable. We sincerely hope IAESB could finish the work as soon as possible and IFAC members can enjoy the results.

DTT Overall we are supportive of the strategic objectives and the work that is currently underway and also that which is planned to be undertaken by the IAESB over the next few years.

We are supportive of the overall strategy illustrated in Figure 2 but have concerns that there is no specific

planned action regarding the 4<sup>th</sup> element “advancing the international debate on emerging issues”.

We encourage the IAESB to invest some time to scope out the key elements of this objective and consider what activities might be relevant and effective.

EFAA EFAA is very much supportive of the approach taken by the IAESB in the development of this Strategy and Work Plan.

EYG We are pleased to comment on the proposed 2014 - 2016 IAESB Strategy and Work Plan (SWP). We support the efforts of the International Accounting Education Standards Board (IAESB) to continue to develop high-quality standards and other publications reflecting good practice in the education, development, and assessment of professional accountants. Education on professional matters is a critical element to developing well-rounded accounting professionals and maintaining the public trust in the accounting profession. We believe that a strong global baseline of accounting education is important given the given the continued globalization of businesses and increasing mobility of accounting professionals. Therefore, we continue to believe that the International Education Standards (IESs) are critical in today’s world. In this respect, we fully support the IAESB strategic objectives and priorities<sup>1</sup> outlined in the SWP and the consultation process to obtain input from global stakeholders to confirm that the SWP is reflective of both the IAESB strategy and the needs and priorities of stakeholders for standards relating to the education of professional accountants.

Overall, we support the IAESB’s proposed work plan as set out in Appendix 1 of the SWP. We note, however, that the work plan is very ambitious. Given the resources available, we have concerns about the Board’s ability to effectively achieve these projects and initiatives in the planned timetable. In our view, therefore, prioritization of projects will be very important, and we support assigning priorities as done in

<sup>1</sup> As described in Figure 2 and Paragraph 18 of the SWP

Appendix 1. However, we believe that certain projects should receive greater priority, while certain others should receive less.

ICAA We are supportive of the role of the IAESB and recognize how your work supports the implementation other standard setting bodies and the IFRSB; as education provides the foundation to the implementation of international standards on auditing, ethics and financial reporting. We consider the work of the IAESB during the period 2014-2016 should be primarily focused on the development of implementation guidance and other tools to assist current and aspiring member bodies to meet the current International Education Standards. We do not support the development of additional standards or updating IESs at this time with the current resources restraints.

We also suggest that several of the identified projects could be contracted out utilizing member body expertise and this could expedite the project timeframes, for example the knowledge sharing and capacity building project and the benchmarking project which we consider should be assigned high priority.

ICAN The institute views that the IESB's strategy and Work Plan is very important as the standards, guidance and information papers issued by Board are critical to the development of accounting education and professionals across the world.

IDW We agree with the IAESB's proposed strategy focus:

- a) Completing the revision of existing and assessing the need for future IESs,
- b) Engaging stakeholders to promote the adoption and endorsement of the revised IESs, and
- c) Supporting and providing guidance to facilitate the implementation of the revised IESs.

Of course it is always important to assess the need to develop additional standards in professional accounting education. We nevertheless want to point out that we cannot see any such need, at least for the moment and the next years

The substantive revision and redrafting of the eight IESs has been – and still is – an enormous achievement of the IAESB. IFAC members should now be given time to make themselves familiar with the revised standards. We therefore encourage the IAESB to focus much of the 2014-2016 work plan on developing guidance to support the implementation of the revised IESs. A revision of IEPs and IEIPs to align them with the revised IESs will contribute to this support.

JICPA We generally agree with the proposed IAESB Strategy and Work Plan for 2014-2016 (hereinafter referred to as the “Plan”), which focuses on providing support to facilitate the implementation and adoption of the revised IESs.

Juvenal I agree with comments. I think that is very important observed the universities, the quality of learn and teach for directors, professors and students for accounting studies, principally in relation the international standards.

NZICA We are supportive of the role of the IAESB and recognize how your work supports the implementation activities of other standard setting bodies, as education provides the foundation to the implementation of international standards on auditing, ethics, and financial reporting. We consider the work of the IAESB during the period 2014-2016 should be primarily focused on the development of implementation guidance and other tools to assist current and aspiring member bodies to meet the current International Education Standards. We do not support the development of additional standards or updating IESs at this time with the current resources restraints.

We also suggest that several of the identified projects could be contracted out utilizing member body expertise and this could expedite the project timeframes, for example the knowledge sharing and capacity building project and the benchmarking project which we consider should be assigned high priority.

PWC Overall we support the IAESB in their completion of the revision of IES1-8 to develop a robust set of high

quality education standards. We also understand that implementation guidance is necessary to ensure the standards are applied consistently and therefore support tasks associated with these two priorities. Beyond these key points we struggle to see the driver behind some of the broader tasks and how these link to the overall objective of serving the public interest.

SAIPA SAIPA is pleased with the overall strategy of the IAESB, and feels that the strategy and work plan will add great value to current member bodies as well as to opening up opportunities for other bodies to begin to comply with the International Education Standards and work towards becoming member bodies too.

### III. Responses to Specific Strategic Initiatives

#### Strategic Initiative 1: Establish and develop IESs and pronouncements.

AICPA-  
PCEEC We note that the vision of the IAESB is to “work in the public interest to develop high quality International Education Standards that are adopted and applied internationally”. We believe that the vision of developing high quality IESs is nearly complete and that the IAESB will best serve the public interest by giving IFAC Member bodies and other interested parties “quiet time” to digest, adopt, and arrange for ultimate implementation of the standards. In the meantime, the only activity within the current work plan that we believe should be pursued is the revision of IES 8.

CICPA From the current revisions of the IESs, new revisions will be more principle-based and more universally applicable. We sincerely hope IAESB could finish the work as soon as possible and IFAC members can enjoy the results.

EFAA We are clear that education standards are an important foundation of the profession. To that end, it seems to us that there is significant merit in an on-going and close dialogue between the IAESB and other IFAC

standard setting boards (for example, International Auditing and Assurance Standards Board (“IAASB”) and International Ethics Standards Board for Accountants (“IESBA”). To our mind, the introduction and subsequent application of high quality ethical and assurance standards will be improved by a continual and close liaison between all standard setting boards. Educational improvements or changes to the competency requirements of professional accountants could be informed by the IAESB being party to the longer term strategy of the IAASB and IESBA.

For example, as the IAASB strives to meet the needs of a dynamic and ever changing demand for audit and assurance products there may be merit in the IAESB being aware of the skills and competence requirements needed to apply such standards in the medium to longer term.

ICAA We disagree that these activities are critical to meet the IAESB’s aims to enhance the competence of professional accountants.

NZICA We disagree that these activities are critical to meet the IAESB’s aims to enhance the competence of professional accountants.

SAICA SAICA remains of the view that IES 8 not be issued as an education standard as these are directed to what is required of member bodies and the learning outcomes applicable to auditors cannot be directed to member bodies who are primarily responsible for the development of professional accountants. This is an education standard that at best should be directed to audit regulators. As such we recommend that this not be issued as a standard but as guidance. If this suggestion is accepted the work done on this should then be combined into any further work required for developing detailed guidance for the implementation of IES 8.

SAICA raises further concern about the amount of time this project has been in progress. We believe that this in itself is an indication that the IAESB is unable to reach conclusion on how to set out requirements for auditors in the form of a standard.

SAICA agrees with the need to develop a definition for professional accountant as this should have been the driving force behind the development of the IESs in the first place. There is no common understanding behind what a professional accountant is and does between different IFAC member bodies and this is required for there to be full clarity in the reading and implementation of the IESs. Consistent implementation of the IESs by member bodies will be incredibly difficult without formally defining the use of this term in the context of the IESs.

Revision of the IAESB Framework is necessary (i.e. consistency of terminology and phraseology etc) but we would submit that this be delegated to a smaller task team for consideration and it is not necessary for the full IAESB to be involved in this project.

**Strategic Initiative 2: Engage stakeholders and promote the adoption and endorsement of the revised IESs.**

AAT We would query the use of the term ‘endorsement’ within the second strategic priority (page 11). The term creates the impression of paying lip service rather than truly engaging. We would suggest the possible use of ‘embedding’ instead.

AAT would suggest that the use of the term ‘outreach work’ in statements 21 and 23 could be misconstrued as potentially patronizing and would suggest that an alternative form of words could be found.

BDO We also agree with the three strategic priorities set out in paragraph 18. In our opinion, the engagement of stakeholders to promote the adoption and endorsement of the revised IESs is critical to their success and that of the IAESB. The stakeholder group, as defined in paragraph 21, should also be widened to include entities and also the general public given the perception of the accounting profession as a whole.

CPA Canada The second major theme in the current and planned priorities relates to advocacy and compliance to ensure the adoption of the revised IESs:

- Promote the Benefits of the Revised IESs as a Benchmark for Country Accountancy Development and the Development of Human Capacity
- Facilitate Knowledge Sharing and Capacity Building in the Professional Accounting Organization Community
- Promote the Recognition and Adoption of the Revised IESs with IFAC Member Bodies, Regulators, and Education Providers through Outreach Activities

We do not dispute the merit of advocating as to the benefits of the education standards and encouraging their adoption by member bodies, regulators and education providers. We believe however, that these activities can be undertaken more efficiently and without the need for the formal structure of a PIAC. We suggest that the investment of resources for consultation and oversight to support the due process of standards development is not warranted to undertake the advocacy role as described in the Strategy and Work Plan.

With regard to the recognition and adoption we believe that the responsibility for ensuring that member bodies implement the revised IESs should rest with the Compliance Advisory Panel.

CICPA In the promotion process of the new IESs and pronouncements, we hope IAESB can considerate the conditions of different stakeholders, conduct more research and provide systemic and continuous introductions of and good practice in fulfilling the requirements of competency frameworks and the continuing professional education for professional auditors, and provide guidance for the all-round implementation of new IESs.



- DTT We remain supportive of the Board's efforts to engage more widely with stakeholders to promote the recognition and adoption of the revised IESs. Several actions are described at a high-level within Appendix 1 but it is unclear how the Board will accomplish these and how the effectiveness of the actions will be measured so that they remain focused and a wise use of the IAESB's limited, and largely volunteer, resources.
- We would appreciate further information on the specific actions that the IAESB will take and how the IAESB will measure progress and success.
- We appreciate that clear communication in a language that is readily understood is a key component of engaging with stakeholders. However, we have concerns that the IAESB may not have sufficient resources to achieve this objective.
- We would urge you to consider which languages present the greatest need for translation and prioritize resources accordingly.
- EFAA We are supportive of the IAESB's initiatives that seek to promote the benefits of the revised IESs, develop implementation guidance for the IESs, and that look to facilitate knowledge sharing and capacity building in the professional accounting organization community. We would urge the IAESB to undertake a thorough Cost / Benefit Analysis prior to commencing these initiatives because we are of the opinion that these would be better informed if the IAESB had performed a post implementation review of its IESs once all these have been clarified and finalised and implemented after a period of say 2-3 years.
- FEE Promoting the recognition and adoption of the revised IESs by engaging with IFAC member bodies, professional accountancy organizations (PAOs), regulators and education providers (paragraph 21 of the

proposed Strategy and Work Plan) is to our view an activity where the IAESB has a limited role.

In the first instance, the IESs are addressed to IFAC member bodies, thus the adoption and endorsement of IESs is a task of the IFAC member bodies. The recently revised IFAC Statements of Membership Obligations (SMOs) are designed to assist PAOs in leading the way to serve the public interest by supporting adoption and implementation of international standards. Under the IFAC member body compliance program, IFAC member bodies have to consider any actions that will need to be taken to address the revised SMO requirements, which generally includes the adoption and endorsement of the revised IESs. We are not aware whether, based on the structure of IFAC, the IAESB as independent standard setter has a role in IFAC's member body compliance program.

Secondly, in countries where IFAC member bodies are only partly or not at all involved in education, the role of IFAC in general or the IAESB in particular is even more limited. Even the IFAC member bodies can only use their best endeavors to ensure that professional accounting education programs delivered by those in charge of education (government authorities, universities or other educational organizations) refer to principles outlined in the IESs. We doubt that the IAESB could have a prominent influential role in these countries.

Additionally, as far as the provision of statutory audit in the European Union is concerned, the EU Statutory Audit Directive already provides a harmonized framework for educational qualification requirements that has to be applied by all stakeholders involved in education of accountants providing statutory audit. For these stakeholders (IFAC member bodies, government authorities or educational organizations that might have shared responsibilities), IESs might be interesting as background material for information, but EU law as implemented into national law prevails. In addition, the EU Statutory Audit Directive is currently under review, which might have an impact on the responsibilities of IFAC member bodies in the EU.

GAA We are of the view that there is already a broad recognition and adoption of the revised IESs such that the proposed advocacy role and board stakeholder engagement is not warranted. Further review of adoption of the standards by PAOs should be the responsibility of the Compliance Advisory Panel.

Translations do not need the resource intensive structure of a PIAB for their completion.

HKICPA We are of the view that there is already a broad recognition and adoption of the revised IESs such that the proposed advocacy role and board stakeholder engagement is not warranted. Further review of adoption of the standards by PAOs should be the responsibility of the Compliance Advisory Panel.

Translations do not need the resource intensive structure of a PIAB for their completion.

ICAA We disagree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants. We appreciate the frustration of setting standards without any ability to influence compliance, but that is the function of IFAC's member bodies.

NZICA We disagree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants. We appreciate the frustration of setting standards without any ability to influence compliance, but that is the function of IFAC's member bodies.

SAICA We believe that directly engaging stakeholders in the adoption and revision of the IESs to be an appropriate activity for IFAC but that this need not be undertaken by the IAESB. It is hard to understand how a committee of individuals can be held responsible for undertaking such task.

Serious consideration needs to be given to the allocation of resources to these activities given the current difficult economic climate in which we find ourselves. Resources are limited and IFAC needs to take cognizance of the amount of resources it has available and in so doing prioritize the allocation of these

resources based on IFAC's overall strategic priorities. In this regard we believe the IFAC Council needs to be engaged to provide the IAESB with a clear message on what these strategic priorities are in relation to the IAESB and therefore how much funding is available for the IAESB to undertake projects with. The projects can then be prioritized and the work plan finalized in accordance with this guidance.

**Strategic Initiative 3: Support and provide guidance to facilitate the implementation of the revised IESs.**

AAT With regard to the proposed strategy, we particularly endorse the aim of supporting and providing guidance to facilitate the implementation of the revised IESs. It is important that these documents demonstrate the value added to organizations and are treated as working documents, rather than running the risk of being viewed as the result of a bureaucratic paper based exercise and going unused. This will be especially crucial for nations where the adoption of global standards is in its infancy; through further work on implementation, IFAC and IAESB should be able to clearly and quickly add practical value.

CPA Canada The Strategy and Work Plan also proposes future priorities both committed and targeted. Many proposed activities focus on providing guidance and support for IES implementation and on encouraging member bodies to adopt the IESs. These include:

- Develop Guidance on Learning Outcomes Approaches for Professional Accounting Education
- Develop guidance on the implementation of IES 8
- Promote the Recognition and Adoption of the Revised IESs with IFAC Member Bodies, Regulators, and Education Providers through Outreach Activities
- Develop implementation guidance on how general education is used to develop the professional accountant
- Develop implementation guidance on entry requirements into professional accounting education

programs

While we agree these are laudable objectives that may be required to support the adoption of the revised IESs, we point out that mature member bodies have significant experience and expertise in developing professional programs incorporating IESs and may not require detailed guidance documents. We suggest an assessment of the relevance and benefit of these guidance documents to meet the needs of most PAOs be undertaken before these projects are commenced.

Further, we suggest that other mechanisms may be better suited to assisting developing PAOs in implementing the revised standards. These could include contracting with other member bodies to provide support and providing summaries of best practices used by other member bodies. The Professional Accountancy Organization Development Committee could coordinate these initiatives.

- DTT We are supportive of a project to ensure that all the publications of the IAESB are consistent with one another. This is imperative in ensuring that the IESs are clear and have maximum impact on implementation.
- EFAA We are supportive of the IAESB's initiatives that seek to promote the benefits of the revised IESs, develop implementation guidance for the IESs, and that look to facilitate knowledge sharing and capacity building in the professional accounting organization community. We would urge the IAESB to undertake a thorough Cost / Benefit Analysis prior to commencing these initiatives because we are of the opinion that these would be better informed if the IAESB had performed a post implementation review of its IESs once all these have been clarified and finalised and implemented after a period of say 2-3 years.
- EYG We believe that the IAESB should commit to updating the existing International Education Practice Statements (IEPS). More timely updates need to occur to the existing Practice Statements so they remain in alignment with the Clarified IESs.

We also believe that the IAESB should commit to a post-implementation review of the clarified IESs which should result in ongoing updates to implementation guidance and renew the commitment of the IAESB to develop additional implementation guidance. Therefore, since revised IES 1 and 7 will become effective in 2014, we believe that the SWP should include developing a plan for a post-implementation review of the revised IESs. The post-implementation review would assist the Board's efforts to monitor the implementation of the revised IESs and would drive the development of a new IEPS related to IES 8, as we indicated above, and would also provide input for the development of future implementation guidance in a latter strategy period. The post-implementation review should be focused on whether the clarified IESs are being consistently understood and implemented in a way that achieves the IAESB's goals in revising and redrafting them. We believe this post-implementation review should occur after a reasonable implementation period (for example, one to two years).

As a result of the suggestions above, we believe the priority assigned to projects within the strategic priority to support and provide guidance to facilitate the implementation of the revised IESs should be revised. The SWP assigns a priority of "targeted" to all projects within this strategic priority. Therefore, we question whether "targeted" is the right priority for projects within this strategic initiative. We suggest that the priority assigned to these projects be changed to "committed".

FEE According to paragraph 24 of the proposed Strategy and Work Plan, the IAESB intends to revise a number of International Education Practice Statements (IEPSs) and International Education Papers (IEIPs) to ensure that they are aligned with the revised IESs and support the implementation of the IESs.

Before starting such a comprehensive project, it might be worth investigating if and how the previous IEPSs and IEIPs were used in practice in order to evaluate their relevance and impact. To that extent, the proposed benchmark study of good practice to determine how IFAC member bodies are implementing the IESs might be of help.

Furthermore, provided that it turns out that there is a certain need for guidance to facilitate the implementation of the revised IESs, it should be kept in mind that IFAC standards are developed on a principles-based approach. Focusing on the underlying aim rather than on detailed restrictions and prohibitions, the principles-based approach combines flexibility with rigor in a way that is unattainable with a rules-based approach. Some guidance or examples of how the principles should be applied may be necessary, extensive guidance might however move too close to a rules-based approach.

GAA The second strategic priority covers guidance through the revision of International Education Practice Statements (IEPSs) and International Education Information Papers (IEIPs). At present it is not clear to us how strong is the need for these revisions. It may be greater amongst the developing PAOs. Such work may be needed for neatness and completeness, but in a resource strained environment the case needs to be much stronger than this. In the public interest one has to look at priorities, and it is our view that there is a much greater need for IFAC's resources to be devoted to the other standard setting boards at this time. The needs of ethics and auditing are far greater than those in education. Adoption is a responsibility of the CAP, and the strong emphasis on capacity building we believe can be better addressed outside of the standard setting board by the Professional Accountancy Organization Development Committee. This Committee can be charged with overseeing the processes to ensure sufficient guidance to facilitate implementation for developing PAOs. This should be a more efficient process.

HKICPA The second strategic priority covers guidance through the revision of International Education Practice Statements (IEPSs) and International Education Information Papers (IEIPs). At present it is not clear to us how strong is the need for these revisions. It may be greater amongst the developing PAOs. Such work may be needed for neatness and completeness, but in a resource strained environment the case needs to be much stronger than this. In the public interest one has to look at priorities, and it is our view that there is a much greater need for IFAC's resources to be devoted to the other standard setting boards at this time. The needs of ethics and auditing are far greater than those in education. Adoption is a responsibility of the

CAP, and the strong emphasis on capacity building we believe can be better addressed outside of the standard setting board by the Professional Accountancy Organization Development Committee. This Committee can be charged with overseeing the processes to ensure sufficient guidance to facilitate implementation for developing PAOs. This should be a more efficient process.

ICAA Notwithstanding, we believe that priority (c) (support and provide guidance to facilitate the implementation of the revised IESs) should be the first (and possibly the only) priority. As stated earlier, we consider the work of the IAESB should now be focused on developing implementation guidance and best practice examples to support member bodies and IFAC's important work of assisting member bodies in developing nations.

We strongly support the work described in paragraphs 24-26.

We agree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants.

ICAN The board should consider including this in the current work plan as this would provide timely feedback on the practicability of the standards and also assist stakeholders to leverage best practice learned from other practitioners.

NZICA Notwithstanding, we believe that priority (c) (support and provide guidance to facilitate the implementation of the revised IESs) should be the first (and possibly the only) priority. As stated earlier, we consider the work of the IAESB should now be focused on developing implementation guidance and best practice examples to support member bodies and IFAC's important work of assisting member bodies in developing nations.



We strongly support the work described in paragraphs 24-26.

We agree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants.

SAICA While development of guidance is a noble activity, we again question whether this needs to be undertaken by the IAESB and whether there are not more efficient and effective ways of developing such guidance.

### **Other Issues Relating to Strategic Priorities**

CGA-Canada The strategic priorities outlined in the Strategy and Work Plan for 2014-2016 should lay a strong foundation for member countries to accelerate implementation of the revised IESs which we believe will lend itself to global convergence and the mobility of professional accounts, in addition to serving the public interest. Accordingly, CGA-Canada supports the objectives of the exposure draft.

ICAA While the IAESB has named three strategic priorities, we are unclear as to the priority or importance assigned to each of these. It would be helpful if the IAESB were to rank each project against a continuum so we could understand which projects are considered by the IAESB to be the highest priority and therefore most important.

ICAN The Board should consider including as part of its priorities the need to advance international debates on emerging issues relating to education development and assessment of professional accountants.

Due to the dynamism and complexity of today's business world it is imperative that the professional accountant is sufficiently skilled to remain relevant in his profession. We are of the view that this is

compelling enough to be included as a strategic priority.

JICPA Clarification of the types of IAESB pronouncements and their roles

In paragraph 18 of the ED, three strategic priorities are stated as follows:

- Establish and develop IESs and pronouncements.
- Engage stakeholders and promote the adoption and endorsement of the revised IESs.
- Support and provide guidance to facilitate the implementation of the revised IESs.

According to Appendix 1 of the ED, in connection with those strategic priorities, various pronouncements such as guidance, information papers (International Education Information Papers (IEIPs)), and International Education Practice Statements (IEPSs) are planned to be developed. However, as outlined in the table below, no specific explanation has been included in the Plan, in regard to how information papers that would be developed in accordance with the priorities (a) and (c) differ in their status, or how each pronouncement is positioned within the IAESB. Therefore, we suggest defining the types of pronouncements used in the IAESB and clarifying their names and expected roles.

(a) Establish and develop IESs and pronouncements	(c) Support and provide guidance to facilitate the implementation of the revised IESs
<ul style="list-style-type: none"> <li><input type="checkbox"/> Develop an IEIP on IES 8 implementation</li> <li><input type="checkbox"/> Develop an IEIP on learning outcomes approach</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Revision of IEPS 1</li> <li><input type="checkbox"/> Revision of IEPS 3</li> <li><input type="checkbox"/> Develop an information paper on general education</li> <li><input type="checkbox"/> Develop an information paper on entry requirements</li> </ul>

- |  |   |
|--|---|
|  | <input type="checkbox"/> Develop IEIP on good practices in implementing the revised IES |
|--|---|

- Juvenal I agree with comments. I suggest for the board, if agree, I think that IFAC / IAESB could be use regional regulators, the groups elaborated for attend for IASB<sup>6</sup>, for integrated more informations about education in accounting studies in the regions, I don't know.
- NZICA While the IAESB has named three strategic priorities, we are unclear as to the priority or importance assigned to each of these. It would be helpful if the IAESB were to rank each project against a continuum so we could understand which projects are considered by the IAESB to be the highest priority and therefore most important.

#### **IV. Responses to IAESB Projects & Activities**

##### **Finalize 2014 – 2016 IAESB Strategy & Work Plan**

- ICAA We deem the strategy and work plan is an operational activity and should not be included here;
- ICAN It is recommended that in future Strategy & Work Plan, the expected completion date should end on or before December 31 of the year preceding the commencement of the Strategy & Work Plan year circle. E.g. 2017-2019 strategy year cycle should be concluded on or before December 31, 2016.

NZICA We deem the strategy and work plan is an operational activity and should not be included here;

### Revision of IES 8

AICPA- PCEEC We note that the vision of the IAESB is to “work in the public interest to develop high quality International Education Standards that are adopted and applied internationally”. We believe that the vision of developing high quality IESs is nearly complete and that the IAESB will best serve the public interest by giving IFAC Member bodies and other interested parties “quiet time” to digest, adopt, and arrange for ultimate implementation of the standards. In the meantime, the only activity within the current work plan that we believe should be pursued is the revision of IES 8.

Finally, with regard to the revision of IES 8, we encourage you to consider moving the targeted completion date from Q2 2014 to an earlier time frame. We feel this is attainable if our suggestion of putting the rest of the remaining work plan on hold is implemented.

CAI The work on the revision of IES 8 be fast tracked  
CGA- Canada The revision of IES 8, Professional Development for Engagement Partners Responsible for Audits of Financial Statements (Revised), has stimulated much interest and response worldwide, in particular the resolve to the issue surrounding the definition and implications of the term 'aspiring engagement partner.' We look forward to the release of the revised version at the end of 2014.

- CPA Canada Completion of the revision IES 8 – we support the need to complete this project, but suggest every effort be made to complete the work in a shorter time frame than is currently contemplated. We would encourage the Board to consider approaches to accelerate the project's completion.
- DTT We believe it is important to finalize this work as a priority. Further delays to the release of the revised IES 8 will not be helpful in assisting some of the IAESBs stakeholders in responding to quality initiatives to execute high quality audits and will result in a lost opportunity for the IAESB to enhance its credibility and relevance in this area.
- GAA This work needs to be completed. We strongly believe it should be able to be completed sooner than Q4 2014. (We also understand that some suggest the revised document would be better treated as guidance to firms rather than a standard.)
- HKICPA This work needs to be completed. We strongly believe it should be able to be completed sooner than Q4 2014. (We also understand that some suggest the revised document would be better treated as guidance to firms rather than a standard.)
- ICAA That IES8 blurs the IPD/CPD focus of the other qualifying level IESs, and as previously suggested possibly withdrawn without further investment. We consider any further clarification of IES8 is most appropriately developed in the form of guidance. Given the exposure draft was released in 2012 for comment we would expect any further work in this area should be completed by mid 2014 at the latest
- ICAEW While we are grateful that serious consideration is being given to recalibrating IES 8, we are concerned by the proposal that IAESB will take until quarter 4 of 2014 to finalise the document. This seems an excessive period of time given the number of years that IES 8 has already been in development and the amount of consultation that has already taken place. If it will take the IAESB a further 18 months to reach publication stage, this indicates that there is an insufficient degree of agreement among member bodies on the way

ahead. This underlines ICAEW's position, previously communicated to the IAESB, that IES 8 should be recalibrated as a voluntary guidance document for firms rather than a formal IES for member bodies.

We must therefore take this opportunity to remind the IAESB of the three crucial areas for improvement within IES 8:

1. Member bodies cannot be held responsible for ensuring implementation. Once a professional accountant has qualified with an IFAC member body, he or she will be subject to that body's general CPD regime but it will be the employing audit firm and the professional accountants themselves who will be responsible for the onward career momentum and the development and assessment of engagement partner competence.
2. There should not be a focus on 'aspiring engagement partners' as this conceptualisation and terminology re-creates the very problems removed by the deletion of 'audit professional' and 'significant audit judgement' from the 2010 iteration of the proposed Standard. It cannot be left open to question who is to be deemed an 'aspiring engagement partner' and at what point in an auditor's career they are identified as such.
3. Given the above, IAESB should re-issue IES 8 as a voluntary guidance document on professional competence for the development of audit engagement partners for use by those audit firms (and only those firms) who would find this helpful.

JICPA

Appendix 1 states that the revision of IES 8 will be completed by the fourth quarter of 2014. While we acknowledge the continued efforts of the IAESB in completing IES 8, we strongly encourage completing it sooner, as it was originally planned to be finalized by the fourth quarter of 2012 in the previous 2010-2013 Strategy and Work Plan.

NZICA That IES8 blurs the IPD/CPD focus of the other qualifying level IESs, and as previously suggested possibly withdrawn without further investment. We consider any further clarification of IES8 is most appropriately developed in the form of guidance. Given the exposure draft was released in 2012 for comment we would expect any further work in this area should be completed by mid 2014 at the latest

SAICA SAICA remains of the view that IES 8 not be issued as an education standard as these are directed to what is required of member bodies and the learning outcomes applicable to auditors cannot be directed to member bodies who are primarily responsible for the development of professional accountants. This is an education standard that at best should be directed to audit regulators. As such we recommend that this not be issued as a standard but as guidance. If this suggestion is accepted the work done on this should then be combined into any further work required for developing detailed guidance for the implementation of IES 8.

SAICA raises further concern about the amount of time this project has been in progress. We believe that this in itself is an indication that the IAESB is unable to reach conclusion on how to set out requirements for auditors in the form of a standard.

### **Develop the Definition for the Professional Accountant**

AICPA-  
PCEEC As for the development of the definition of Professional Accountant, we also believe this is outside the realm of responsibility of the IAESB and would be better suited for consideration by the IFAC Board with input from all IFAC standard setting bodies and the PIOB.

BDO We believe that the *Development of the Definition for the Professional Accountant* should be made a higher

priority. As the term professional accountant underpins the IAESBs work and is effectively the target audience of many of the IES requirements, we believe that this should be completed as soon as possible. This term is also used in IES 8, *Competence Requirements for Audit Professionals* (and the proposed revised IES in respect of Professional Development for Engagement Partners), and as such it would seem logical that it should be defined prior to the publishing of that standard. We also suggest that the IAESB review this new definition and the impact on the recently approved IESs that cover IPD.

- CAI The proposed project regarding the definition of the term Professional Accountant has implications beyond the responsibilities of the IAESB and probably should be undertaken by specific task force appointed by the IFAC Board
- CPA Canada **Definition of “Professional Accountant”**. This is a project with wider applicability than the IAESB’s education-related mandate. We believe the definition of “professional accountant” would be more appropriately undertaken as part of a broader project of the IFAC Board or of a special work group reporting to the IFAC Board.
- DTT We appreciate the need to revise the definition of professional accountant to reflect the increasing number of member bodies and the different types of membership they offer. However, we are concerned that this project may undermine the significant effort that has already been expended on revising the IESs.
- We are concerned that announcing this project without more information about its scope and potential impact, stakeholders may be deterred from more quickly adopting, endorsing and/or implementing the newly revised IESs.
- We urge the IAESB carefully to consider the issues emerging from this review and establish whether they might be addressed through the provision of guidance in the form of Information Papers or Practice



Statements, rather than full standards.

- EYG We support the development of the definition of a professional accountant. However, we believe that the Board needs to consult and collaborate with the other International Federation of Accountants (IFAC) standard-setting boards and staff on the development of this definition, given the potential effect it may have in particular on standards established by the International Auditing and Assurance Standards Board and the International Ethics Standards Board for Accountants. Therefore, we believe this collaborative approach should be reflected in the SWP.
- GAA This project appears to have been initiated only recently. The definition has implications going beyond the responsibilities of the IAESB. We recommend that this work should not be pursued by the IAESB but, if it is to be proceeded with, for this to be done by a special working party established by and reporting to the IFAC Board. The definition for the term Professional Accountant is not simply a matter relevant to education standards.
- HKICPA This project appears to have been initiated only recently. The definition has implications going beyond the responsibilities of the IAESB. We recommend that this work should not be pursued by the IAESB but, if it is to be proceeded with, for this to be done by a special working party established by and reporting to the IFAC Board. The definition for the term Professional Accountant is not simply a matter relevant to education standards.
- ICAA We believe that the professional accountant definition is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a “professional accountant”. We suggest the work to define the term “professional accountant” should not be undertaken by the IAESB in isolation and we would recommend this is a project undertaken across IFAC. We recommend the work in this area also addresses the term “accounting technician” and recognizes their role in professional

accounting organizations and the important role they play in many countries including developing and emerging economies;

ICAEW We would also question the need to revisit the definition of ‘professional accountant’. We were unaware this work had been started. If such work is deemed to be essential, then it would appear to be a pan-IFAC matter rather than something which should fall within the remit of IAESB.

ICAN The institute agrees that this is a priority matter. The definition should consider the following

- broader perspectives of what professional accountants do and can do following the nature of contemporary professional education,
- the type of knowledge and skill required
- practical exposures and workplace realities
- and the evolving diversities of the accounting profession into areas like financial advisory, financial strategy, Risk Management, Forensic Accounting, Investment Management, Liquidation & Receivership etc.

the definition should go beyond the traditional functions of an accountant that is continually changing with the time.

NZICA We believe that the professional accountant definition is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a “professional accountant”. We suggest the work to define the term “professional accountant” should not be undertaken by the IAESB in isolation and we would recommend this is a project undertaken across IFAC. We recommend the work in this area also addresses the term “accounting technician” and recognizes their role in professional accounting organizations and the important role they play in many countries including developing and emerging economies;

SAICA SAICA agrees with the need to develop a definition for professional accountant as this should have been

the driving force behind the development of the IESs in the first place. There is no common understanding behind what a professional accountant is and does between different IFAC member bodies and this is required for there to be full clarity in the reading and implementation of the IESs. Consistent implementation of the IESs by member bodies will be incredibly difficult without formally defining the use of this term in the context of the IESs.

SAIPA In particular we would like to support the development of the revised definition for the Professional Accountant as we believe this would ultimately assist in supporting the identification of outcomes linked to the IAESB strategy for encouraging learning outcomes approaches (i.e. taking the definition and expanding on this in order to identify learning outcomes aligned to the definition).

#### **Revise the IAESB Framework for the International Education Standards for Professional Accountants (2009)**

CPA Canada **Revision the IAESB Framework *International Education Standards for Professional Accountants***. With the completion of the IES revision project, we question the need for an immediate revision of the IAESB Framework. The proposed framework revision appears to suggest the development of further standards and revisions of current standards which seems unnecessary in the near term. We believe the more appropriate focus of the global accounting profession with regards to education is the consistent implementation of the revised standards and the development of guidance and support for developing PAOs. However, this update should not be a long-term effort and we believe the expected completion date needs to align as close as possible with the effective date of the clarified IESs.

EYG We support the revision of the IAESB Framework for International Education Standards (Framework). The Framework describes and defines educational concepts that are fundamental to the implementation of the

IESs. However, as a result of the IESs Revisions Project, we believe that certain concepts and terminology in the Framework need updating. Therefore, a review and update of the Framework, in light of the clarified IESs, is appropriate.

GAA Given the recent effort in revising the standards themselves, we do not attach a high priority nor understand the need for further revisions of the framework at this time.

HKICPA Given the recent effort in revising the standards themselves, we do not attach a high priority nor understand the need for further revisions of the framework at this time.

ICAA The framework is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a professional accountant

ICAEW We doubt too the benefits of revising the recent (2009) IAESB framework for IESs  
NZICA The framework is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a professional accountant

SAICA Revision of the IAESB Framework is necessary (i.e. consistency of terminology and phraseology etc) but we would submit that this be delegated to a smaller task team for consideration and it is not necessary for the full IAESB to be involved in this project.

### **Develop Guidance on Learning Outcomes Approaches for Professional Accounting Education**

ACCA ACCA feels that the International Education Paper should address the scope and limitations of e-assessment for higher intellectual domains and the suitability of different models for education, training and

demonstrating work-based competencies.

AICPA-  
PCEEC

We suggest that the all other areas of the current work plan be put on hold, since those activities, e.g. developing guidance on learning outcomes approaches, are either not mission critical or are outside the purview of the IAESB.

GAA

We note that whilst this project is listed under the current work program Appendix 1 implies that the board has not commenced this work but only agreed to undertake the project in the period 2014-2016. We respectfully suggest that this project is not a high priority for all PAOs. If it can be shown that sufficient PAOs need such an information paper, especially amongst the developing PAOs, those member bodies using learning outcomes approaches should be invited to summarise their experiences and learnings. One of them could be invited, or contracted, to compile these into a summary, or the work could be outsourced. Such work does not need the resource demanding processes associated with a Public Interest Activity, and its oversight.

First however the need for such work should be tested.

HKICPA

We note that whilst this project is listed under the current work program Appendix 1 implies that the board has not commenced this work but only agreed to undertake the project in the period 2014-2016. We respectfully suggest that this project is not a high priority for all PAOs. If it can be shown that sufficient PAOs need such an information paper, especially amongst the developing PAOs, those member bodies using learning outcomes approaches should be invited to summarise their experiences and learnings. One of them could be invited, or contracted, to compile these into a summary, or the work could be outsourced. Such work does not need the resource demanding processes associated with a Public Interest Activity, and its oversight.

First however the need for such work should be tested.

- ICAA            Guidance on use of a learning outcomes approach to designing qualifying programs is useful
- ICAEW          We do not see that the development of guidance on learning outcome approaches for professional accounting education is a priority either.
- JICPA           Implementation guidance on competence areas other than information technology in IES 2
- Among the competence areas included in IES 2, the guidance on information technology, which has been issued as IES 2, is the only guidance published to date. Further, no such guidance has been issued for other competence areas mentioned in IES 2. In view of the extensive areas of competence, as well as the learning outcomes and minimum levels of proficiency expected of aspiring professional accountants in IES 2, we believe that the implementation guidance for other competence areas would also need to be prepared to promote the implementation of the revised IES 2.
- As it has not been specifically mentioned in the Plan, we recommend the IAESB to consider adding new projects on the development of the implementation guidance for IES 2 under the item, *“Develop Guidance on Learning Outcomes Approaches for Approaches for Professional Accounting Education.”*
- NZICA           Guidance on use of a learning outcomes approach to designing qualifying programs is useful
- PWC             In the explanatory memorandum paragraph 6 it states that the guidance on learning outcomes and guidance on the implementation of IES 8 are already projects which are in progress, however in the activities and projects table in Appendix 1 these are stated as committed rather than in-progress. Please could you clarify which is correct?

**Develop Guidance on the Implementation of IES 8**

- BDO We note that there is approximately a one year gap between the revision of IES 8 and the related implementation guidance project - *Develop Guidance on the Implementation of IES 8*. In order for the guidance to be useful on implementation, we believe these should be released concurrently, even if this means that the IES 8 exposure draft is delayed.
- EYG We believe the Board should give further consideration to the timing of the development of the implementation guidance on IES 8. In our view, rather than publishing this guidance shortly after the issuance of IES 8, it may be more appropriate to wait until the standard has been effective for a period of time to be able to have a clearer understanding of the implementation guidance that may be needed. In this regard, we believe that a post-implementation review a reasonable period (for example, one to two years) after initial implementation would be useful to gather feedback from adopters to help drive the need for, and the related nature and extent of, any additional implementation guidance. Additionally, we believe that the Board should consider reaching out to the Small and Medium Practices Committee (SMP) and the Forum of Firms (FOF) to gather feedback from the perspective of accounting firms. We believe that input from the FOF and SMPs will be important in determining if IES 8 is being implemented effectively by Member Bodies for the benefit of their constituents. Finally, we believe the development of implementation guidance for IES 8 would be more appropriately categorized in the SWP as part of the strategic priority to support and provide guidance to facilitate the implementation of the revised IESs.
- GAA The suggestion that this is current work seems inconsistent with Appendix 1. It is dependent on the completion of revisions to IES 8. We are not convinced that additional implementation guidance is needed but when IES 8 is finalized the need for such work should be evaluated amongst member bodies. If a need is clearly demonstrated then again it could be pursued in a more efficient manner than using a PIAB, by

outsourcing, or PAOs that have competence frameworks for audit engagement partners being asked to summarize these and provide examples of good practice. A member body could be asked to summarize these, or the task outsourced.

HKICPA The suggestion that this is current work seems inconsistent with Appendix 1. It is dependent on the completion of revisions to IES 8. We are not convinced that additional implementation guidance is needed but when IES 8 is finalized the need for such work should be evaluated amongst member bodies. If a need is clearly demonstrated then again it could be pursued in a more efficient manner than using a PIAB, by outsourcing, or PAOs that have competence frameworks for audit engagement partners being asked to summarize these and provide examples of good practice. A member body could be asked to summarize these, or the task outsourced.

ICAA	Guidance on implementation of IES8 is likely to be useful to some member bodies and firms – see comments above	See Section on the Revision of IES 8
NZICA	Guidance on implementation of IES8 is likely to be useful to some member bodies and firms – see comments above	See Section on the Revision of IES 8

### **Scan Environment for Gaps in the Development, Delivery, and Assessment of Professional Accounting Education**

BDO In relation to the project to *Scan Environment for Gaps in the Development, Delivery and Assessment of Professional Accounting Education*, we believe this should come earlier in the timeline. We note that one of the objectives of the project is to identify problem areas in the implementation of the revised IESs. We assume this is so that additional guidance can be issued to assist implementation. Based on the timing of this project starting in Q4 2015, the time required to complete the project and then provide



guidance to assist implementation would make it less useful in this regard. While we agree with the timing of the remaining objectives of the project, it may prove more beneficial to separate this into two projects, with the review of implementation difficulties coming well in advance of the other.

- EFAA We feel that this, in conjunction with the work that is being undertaken by the IAESB to “Scan the Environment for Gaps in the Development, Delivery, and Assessment of Professional Accounting Education” would be of value.
- FEE We doubt that the proposed activity to “continually scan of the dynamic environment in which professional accountants work to assess the need to revise existing IESs or develop additional standards” (paragraph 20 of the proposed Strategy and Work Plan) justifies that the IAESB remains fully operational. It should be sufficient to carry out such scans occasionally and based on evidence that a scan is needed, which can be done with a minimum investment of time and resources by the IFAC secretariat upon recommendation from IFAC member bodies.
- GAA With the exception of the proposed scan of the environment, which we also see as non-critical
- HKICPA With the exception of the proposed scan of the environment, which we also see as non-critical
- ICAA Scanning the environment for areas to develop more standards is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a professional accountant. We would expect environmental scans are undertaken by the Board and/or staff on an ongoing basis and any issues raised for consideration in strategic planning and the development of work plans; as such we do not believe it should feature as a standalone project in the work plan
- ICAEW ICAEW is particularly concerned by the proposal that the IAESB should, “Explore the need for new IESs and other types of guidance materials that identify the CPD requirements for other specialization

pathways...” This appears to constitute a blank cheque of an unspecified and unbounded programme of work.

- JICPA      Development of new IESs for specialization pathways
- Under the item “*Scan Environment for Gaps in the Development, Delivery, and Assessment of Professional Accounting Education*” in Appendix 1, the IAESB states that it will explore the need for new IESs and other types of guidance materials that identify the CPD requirements for other specialization pathways. In consideration of those specialization areas that require more advanced levels of competence in comparison with the general requirements for professional accountants stated in IESs 1-7, we request the IAESB to carefully evaluate the need, as the IESs or guidance materials with specific focus on particular pathways may further assist IFAC member bodies to implement IESs.
- NZICA      Scanning the environment for areas to develop more standards is less important than assisting PAOs ensure their members reach a level that would satisfy any reasonable expectation of a professional accountant. We would expect environmental scans are undertaken by the Board and/or staff on an ongoing basis and any issues raised for consideration in strategic planning and the development of work plans; as such we do not believe it should feature as a standalone project in the work plan
- SAIPA      We are also very pleased with the plan to develop guidance materials that identify the CPD requirements for specialist pathways, as it is becoming more and more prevalent for Professional Accountants to follow specialty areas in their careers.

## Develop 2017 – 2019 Strategy and Work Plan

**Promote the Recognition and Adoption of the Revised IESs with IFAC Member Bodies, Regulators, and Education Providers through Outreach Activities**

ACCA ACCA feels the United Nations Conference on Trade and Development (UNCTAD) should be included in the list of bodies that IAESB seek endorsement.

BDO In regards to the project, *Promote the Recognition and Adoption of the Revised IESs with IFAC Member Bodies, Regulators and Education Providers Through Outreach Activities*, we believe this should be broader than just the developing countries, and also include increasing the visibility of the IESs in developed countries. This is currently scheduled for Q1 2014 and we believe this should occur again after the revised IES 8 has been issued and the revised framework, *Revise the IAESB Framework for the International Education Standards for Professional Accountants (2009)*, has been finalized (currently planned to start Q2 2015) in order to maintain momentum.

The advocacy project noted above is currently scheduled for Q1 2014; however, the project *Facilitate the Translation Process of the IESs and Other IAESB Education Pronouncements* is scheduled for Q2 2014. We believe the advocacy project would be more successful if the standards were available in a language other than English, with which the population were more familiar, and therefore the board may want to consider the timing of these two projects.

CPA Canada With regard to the recognition and adoption we believe that the responsibility for ensuring that member bodies implement the revised IESs should rest with the Compliance Advisory Panel.

ICAA We believe that adoption of and compliance with IESs will naturally follow after guidance is prepared and

made available to developing nations. The promotion should be deferred, or limited to specific high needs cases.

ICAEW We recognise that it is important that there is member body (and wider) recognition of the revised IESs, but we think that the IESs are already wide-known and we question how cost-effective a new programme of awareness-raising work would be.

JICPA Outreach Activities  
We agree that the IAESB gives priority to outreach activities to promote the adoption and implementation of the revised IESs in the Plan. Along with the standard setting activities, we consider the outreach activities to be equally important to promote the revised IESs. We therefore support the IAESB to conduct effective outreach activities as planned.

NZICA We believe that adoption of and compliance with IESs will naturally follow after guidance is prepared and made available to developing nations. The promotion should be deferred, or limited to specific high needs cases.

SAICA We believe that directly engaging stakeholders in the adoption and revision of the IESs to be an appropriate activity for IFAC but that this need not be undertaken by the IAESB. It is hard to understand how a committee of individuals can be held responsible for undertaking such task.

Serious consideration needs to be given to the allocation of resources to these activities given the current difficult economic climate in which we find ourselves. Resources are limited and IFAC needs to take cognizance of the amount of resources it has available and in so doing prioritize the allocation of these resources based on IFAC's overall strategic priorities. In this regard we believe the IFAC Council needs to

be engaged to provide the IAESB with a clear message on what these strategic priorities are in relation to the IAESB and therefore how much funding is available for the IAESB to undertake projects with. The projects can then be prioritized and the work plan finalized in accordance with this guidance.

### **Facilitate the Translation Process of the IESs and Other IAESB Education Pronouncements**

BDO The advocacy project noted above is currently scheduled for Q1 2014; however, the project *Facilitate the Translation Process of the IESs and Other IAESB Education Pronouncements* is scheduled for Q2 2014. We believe the advocacy project would be more successful if the standards were available in a language other than English, with which the population were more familiar, and therefore the board may want to consider the timing of these two projects.

DTT We appreciate that clear communication in a language that is readily understood is a key component of engaging with stakeholders. However, we have concerns that the IAESB may not have sufficient resources to achieve this objective.

We would urge you to consider which languages present the greatest need for translation and prioritize resources accordingly.

FEE Activities related to the translation of IESs as suggested in paragraph 22 of the proposed Strategy and Work Plan are – as explained in Appendix 1 of the Strategy and Work Plan – aimed at identifying experts who can perform translation. We assume that acting as facilitator in identifying expertise within IFAC member bodies is an activity that can be carried out at IFAC secretariat level.

- GAA Translations do not need the resource intensive structure of a PIAB for their completion.
- HKICPA Translations do not need the resource intensive structure of a PIAB for their completion.
- ICAA Guidance is more urgent than translation of the standards. We understand translations are largely an IFAC staff function and therefore this work could be undertaken with oversight by the IAESB and require minimum input by the Board.
- NZICA Guidance is more urgent than translation of the standards. We understand translations are largely an IFAC staff function and therefore this work could be undertaken with oversight by the IAESB and require minimum input by the Board.

**Revise IEPS 1, Approaches to Developing and Maintaining Professional Values, Ethics and Attitudes**

CGA-Canada Section 7 in the Explanatory Memorandum states IAESB's intention to give priority to the implementation and guidance on ethics education and practical experience. CGA-Canada commends the IAESB on setting itself this priority of developing guidance on ethics education and practical experience. We encourage the IAESB to work closely with the International Ethics Standards Board for Accountants (IESBA) as we are given to understand that the IESBA shares components of this same agenda. In so doing, the IAESB will be able to identify where synergies might lie in order to combine efforts in this regard.

The CGA program of professional studies is an internationally recognized professional accounting program that has been a pioneer in incorporating ethics education as an integral part of its professional program. The integration of ethics education into the CGA program (as opposed to a stand-alone ethics course) has strengthened the accounting profession in Canada and internationally.

Exposure to this ethics education is enhanced by the requirement for a minimum of thirty-six months of practical work experience completed simultaneously with the education and certification requirements of the CGA program of professional studies.

Previously, CGA-Canada has submitted comments on IES 4, **Professional Values, Ethics, and Attitudes**. At the time we had also fully supported IAESB's focus on ethics education which is fundamental to the accounting profession.

- EYG We believe that the IAESB should commit to updating the existing International Education Practice Statements (IEPS). More timely updates need to occur to the existing Practice Statements so they remain in alignment with the Clarified IESs.
- ICAA We believe the revision of IEPS 1 should be a very high priority.
- ICAEW Finally, we note that a number of new IEPSs and guidance documents are targeted for future development. We believe that the IESs that have already been published in these areas are likely to be sufficient and again we do not support the launching of new work in these areas.
- ICAN The Institute agrees that this is a priority matter. We suggest that the board considers setting the date of completion of IEPS 1 before the effective date of the implementation of the revised IES 4. This is to ensure that stakeholders have sufficient guidance for the proper implementation of the standard.
- NZICA We believe the revision of IEPS 1 should be a very high priority.

### Revise IEPS 3, Practical Experience Requirements – Initial Professional Development for Professional Accountants

- CGA-Canada Section 7 in the Explanatory Memorandum states IAESB's intention to give priority to the implementation and guidance on ethics education and practical experience. CGA-Canada commends the IAESB on setting itself this priority of developing guidance on ethics education and practical experience.
- EYG We believe that the IAESB should commit to updating the existing International Education Practice Statements (IEPS). More timely updates need to occur to the existing Practice Statements so they remain in alignment with the Clarified IESs.
- ICAA We believe the revision of IEPS 3 should be a very high priority
- ICAEW Finally, we note that a number of new IEPSs and guidance documents are targeted for future development. We believe that the IESs that have already been published in these areas are likely to be sufficient and again we do not support the launching of new work in these areas.
- ICAN The institute also agrees that this is a priority matter. We suggest that the board should consider setting the date of completion to Q2 2014 as the effective date of the implementation of IES 5 is July 1, 2015. This would ensure that stakeholders have sufficient guidance for the proper implementation of the standard.
- NZICA We believe the revision of IEPS 3 should be a very high priority



**Develop implementation guidance on how general education is used to develop the professional accountant**

- BDO We note that the project to *Develop implementation guidance on how general education is used to develop the professional accountant* is prioritized as targeted, with a commencement date of TBD. We believe this should be a higher priority for the Board as currently there is no guidance or benchmark for general education in professional development and it is unclear how it fits within a more structured program at present.
- ICAA We believe the development of guidance on general education should be a very high priority
- ICAN We recommend that the board should consider aligning the date of this project with the effective date of usage of the revised 'Definition of a professional accountant among member bodies. Q4 of 2014 is recommended.
- NZICA We believe the development of guidance on general education should be a very high priority

**Develop implementation guidance on entry requirements into professional accounting education programs**

- ACCA Clarification is required on the development of entry requirement guidance. There is a lack of reference to technician/foundation level qualifications in developing accounting from a grassroots approach, as opposed to through degree education. Are technician/foundation level qualifications included in the 'alternative pathways to entry into a professional accounting education program'?
- ICAA We believe implementation guidance on entry requirements into professional education programs should be a very high priority

ICAN It is recommended that educational qualification at the secondary school level with the appropriate credits should be an acceptable benchmark for students desiring to pursue professional accounting education from the foundation or basics of the professional accountancy education. It is also recommended that candidates desirous of entering the professional accountancy educational system must be of impeccable character.

JICPA Information paper on entry requirements  
We recommend the IAESB to describe clearly that the implementation guidance on entry requirements into professional accounting education programs stated in the item “*Support and Provide Guidance to Facilitate the Implementation of the Revised IESs*” would be developed to be in line with the requirements in the revised IES 1.

NZICA We believe implementation guidance on entry requirements into professional education programs should be a very high priority

SAIPA SAIPA encourages the IAESB to prioritize the development of information papers specifically around the alternative pathways to entry into a professional accounting education program, as we find that this would be most useful in developing countries.

**Promote the Benefits of the Revised IESs as a Benchmark for Country Accountancy Development and the Development of Human Capacity**

ACCA ACCA feels the UNCTAD should be included in the list of bodies that IAESB seek endorsement along with how IAESB links to the UNCTAD initiative.

CGA-Canada We support the IAESB's intentions to engage directly in capacity building in the accounting profession. For new and emerging economies and developing countries this level of engagement will be essential to ensure application of the standards in the professional accounting education programs in these member countries and will directly serve to hasten the progress of global convergence of these standards.

The IAESB is in the unique position to facilitate extensive collaboration and co-operation between multiple IFAC member bodies; particularly if it engages with well-developed member bodies such as our own (CGA-Canada has well over 100 years of expertise in the development of a robust and dynamic professional accounting program, course materials and assessments for certification of licensed accounting professionals). As such, we encourage the senior technical manager to contact us in order to identify opportunities for our two organizations to work together.

CPA Canada CPA Canada acknowledges the significant work completed by the IEASB over the past four years in the revision of its eight International Education Standards (IES). We believe that education standards reflecting best practices for the initial and continuing professional development of our members contributes to increased competency for professional accountants, and thus to our mandate to protect the public interest.

DTT We are supportive of this exercise but feel that the priority is too low. We would have expected that the IAESB would use the information obtained to promote the implementation of the standards.

We believe that the results from the survey of good practice will present the true picture of the level of adoption of the standards.

Once this information is gathered, it will provide a platform from which to develop the outreach and translation activities which are currently prioritized above this.

- EYG We encourage IAESB to review the priority of this item. Additionally, we believe it would be helpful to clarify the terms “development of human capacity” and “capacity building” as referred to in this strategic priority, and particularly to clarify whether the terms are intended to have the same or different meanings in the context within which they are used.
- FEE Before starting such a comprehensive project, it might be worth investigating if and how the previous IEPs and IEIPs were used in practice in order to evaluate their relevance and impact. To that extent, the proposed benchmark study of good practice to determine how IFAC member bodies are implementing the IESs might be of help.
- ICAA We agree that these activities are critical to meet the IAESB’s aims to enhance the competence of professional accountants. But these activities should be undertaken after the next activity (facilitate knowledge sharing and capacity building in the PAO community).  
We welcome the development of benchmarking tools that would offer practical assistance to member bodies to measure progress towards compliance and identify areas for further improvement.
- NZICA We agree that these activities are critical to meet the IAESB’s aims to enhance the competence of professional accountants. But these activities should be undertaken after the next activity (facilitate knowledge sharing and capacity building in the PAO community).

**Facilitate Knowledge Sharing and Capacity Building in the Professional Accounting Organization Community**

- DTT We are unclear as to how a toolkit would provide any additional information to what is already provided by the IESs and associated implementation guidance.

We have concerns that a toolkit would become out of date very quickly.

We encourage the Board to consider a more dynamic approach to facilitating the sharing of knowledge by embracing technology to connect people.

ICAA We agree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants. We would like to see this treated as the highest priority. It is disappointing that it is not prioritised in the work plan and is not being considered until 2016.

We strongly support the identification and sharing of educational materials, and the provision of a hosted access service by the IAESB. The availability of shared information is an efficient means of assisting and encouraging member bodies in their move towards compliance and in the raising of individual standards. This is one key project that could be outsourced and expedited.

NZICA We agree that these activities are critical to meet the IAESB's aims to enhance the competence of professional accountants. We would like to see this treated as the highest priority. It is disappointing that it is not prioritised in the work plan and is not being considered until 2016.

We strongly support the identification and sharing of educational materials, and the provision of a hosted access service by the IAESB. The availability of shared information is an efficient means of assisting and encouraging member bodies in their move towards compliance and in the raising of individual standards. This is one key project that could be outsourced and expedited.

SAIPA We encourage knowledge sharing in terms of supporting developing member bodies in working towards compliance with the standards. However there must be a marketing campaign built into this in order to reach those bodies that this strategy would be assisting. It would be pointless to develop a toolkit and have no way of reaching those the toolkit is intended to reach. However we do recognize that this is an

operational requirement, and we do support the broad strategy of developing this guide.

## Other Projects

ICAA Other projects not identified: we would be enthusiastic to have an IEP (not standards) developed on post-admission specialisations.

## V. Comments on Other Matters

AAT AAT would like to highlight a query concerning the use of the term 'professional accountant' as utilised in the Chairman's statement. The standards referred to within the IESs are equally applicable to accounting technicians belonging to IFAC member bodies. It is in the public interest that these people are properly regulated and supported so we would like to see this explicitly recognized and referenced within through the use of appropriate terminology and language.

Point 5 within the Chairman's statement appears to include an error; we believe the sentence should read "also impacts the quality of professional accounting..."

We would like to query the need for a separate stated 'higher purpose' over and above the stated 'mission' and would suggest that these are integrated into the overall mission statement. Statement number 13 in particular appears to be very similar to statement 15 (under 'Our Mission').

ACCA ACCA is pleased to see the prominence of public interest in this strategy document and the explicit recognition that all IAESB strategic priorities are designed with this overall concept in mind as a capstone.

ACCA fully supports the promotion of accounting education standards in a much wider constituency as this will ultimately help to increase accounting capacity across the world.

ACCA suggests the document includes reference to good practice on including integrated reporting principles in the accounting curriculum.

### **Figure 2 IAESB Strategic Objectives**

Clarification is required on whether thought leadership is included in pillar 4 of Figure 2: IAESB Strategic Objectives.

ANAN

- “APPENDIX 1: IAESB Activities and Projects” should be considered in line with local programs of member countries. We suggest that member countries be allowed to adjust “priority” and “expected date of completion” columns (on pages 13 – 16) in line with their local programs and activities.
- In order to have effective enforcement of the Standards in member countries, Universities need to be involved since they provide primary professional accountancy education. Of course achieving this is not without a challenge since Universities are not members of the IFAC. We suggest that IESB should provide a framework in which Universities are carried along or brought into the picture of IES implementation.
- In order to raise public confidence and trust, the enforcement of IES and adherence to acceptable accounting standard should not be left to be carried out by the regulatory bodies only, but need be backed by some sort of legislation in all the IFAC member countries. It is therefore essential to make efforts to ensure that enforcement and adherence to acceptable standards are supported by legislation. Furthermore, enforcement of IES strategies is equally important and need to be identified as an item in the work plan.
- Dissimilarities resulting from culture, languages, legal, social system and economic development have impact on accountancy education matters than they do in auditing and possibly ethics. We

suggest a close coordination between IAESB and the developing nations committee during this process to ensure that the revised standards reflect the concerns of professional accountants in the developing world.

### **Omissions Observed**

- On page 5, paragraph 6, last sentence, last line; the word '**of**' should be inserted between the completion and the revision of IES 8.
- On same page 5, paragraph 8, first line; 'jts' should be replaced with '**its**'.
- On same page 5, paragraph 8, third line; **comma** (,) should be inserted between Plan and include.
- There may be need to replace capital '**A**' with small 'a' used in all the word 'accountant'. This is to be corrected in all the pages where accountant is used.

BDO

### ***Our Higher Purpose***

It is our opinion that the 'higher purpose,' as outlined in paragraph 13, should be replaced in its entirety with wording already published on the IAESB website. As it is currently worded, we believe the higher purpose is vague and could be interpreted to be broader than the true purpose of the IAESB.

We suggest one of the following:

The first sentence from the 'About IAESB' page:

*'The IAESB develops and issues, in the public interest, standards and guidance on the learning and development required to develop and maintain professional competence during the career of a professional accountant.'*

An extract from the 'Purpose' paragraph of the 'Terms of reference':



*'The IAESB develops and issues, in the public interest and under its own authority, high- quality standards, practice statements, information papers and other information documents on initial professional development of professional accountants and on their continuing professional development for their roles within the accountancy profession.'*

We support the inclusion of the information in paragraph 14 as this expands on the paragraph above to include both competency and capacity. Each of these areas is of critical importance in continuing to maintain and develop the profession and to make the point that a professional accountant may have the capacity to perform the role but can only demonstrate competence in a workplace environment.

### **Our Mission**

We believe paragraph 15 could be further expanded to specifically mention the development and enhancement of education of both aspiring professional accountants and members of the accounting profession. As currently phrased, it could be interpreted to only apply to the education of 'aspiring professional accountants' as it does not mention the continuing professional development of members of the accounting profession. We believe that given regulatory interest in areas of CPD this area is one which should be emphasised within this particular paragraph.

In addition, further clarity is needed for this statement, as the current phrasing suggests that the IAESB itself is developing the education provided, as opposed to influencing the local member bodies' development of education.

### **Our Strategy**

We agree with the four strategic objectives outlined in paragraph 7 and Figure 2 of the exposure draft and believe that they are appropriately aligned with the 'Higher Purpose' as outlined. We would, however, suggest that the IAESB consider the inclusion of 'guidance' into the third objective (i.e.,

education benchmarks) and suggest that it reads as follows:

- ‘Developing education benchmarks and guidance for measuring the implementation of the International Education Standards’

We believe that practical guidance is equally important when outlining benchmarks for measuring the implementation of any standard.

Finally, we suggest the IAESB reconsider the location of their Board Meetings. In prior years, the IAESB has performed significant outreach work with local IFAC member bodies and, in particular, across the newly emerging and developing economies.

With the focus of recent meetings being in North America and Western Europe, we believe that the IAESB is missing an opportunity to raise the profile of accounting education and help develop good practices in those emerging economies and accounting jurisdictions which are most in need. Having a physical presence and engaging with IFAC member bodies and potential IFAC member bodies still in their infancy is as important as issuing public pronouncements.

DTT We are supportive of the overall strategy illustrated in Figure 2 but have concerns that there is no specific planned action regarding the 4<sup>th</sup> element “advancing the international debate on emerging issues”.

We encourage the IAESB to invest some time to scope out the key elements of this objective and consider what activities might be relevant and effective.

EFAA We are pleased to note the inclusion of the IAESB Mission statement along with the Statement of Higher Purpose which places the importance of stakeholder confidence and trust at the forefront of its actions.

EFAA, as a body that represents SMPs, is very much aware of the status of the SMP as the acknowledged trusted advisor to SMEs. In this regard we agree that trust is of fundamental importance to the profession.

ICAA We believe that high-quality standards establish a level for member bodies to attain, and should not simply reflect (good) practice.

ICAEW We note with concern the wide range of additional activities that are planned by the IAESB over the coming three years. The fact that many of the entries that are listed in Appendix 1 have been designated ‘in progress’ or ‘committed’ should not mean that this work is automatically carried forward. As explained above, priorities have to be reassessed in the light of changing times and we judge that the large majority of the proposed activities in Appendix 1 go well beyond the ‘care and maintenance’ activity that ICAEW can support.

ICAN It is recommended that the success measures are defined upfront and included in the work plan as conceived.

JICPA Revision of IEPS 2

We note that the revision of IEPS 2 is not mentioned in Appendix 1 under the item “*Support and Provide Guidance to Facilitate the Implementation of the Revised IESs.*” Given that the IEPS 2 is an old practice statement published in October 2007, we believe that the revision of IEPS 2 should also be included in the Plan, and be redrafted in conjunction with the current overall revision of IESs.

#### Clarification of Figure 1: IAESB activities

- In view of the fact that there is no specific reference to the particular activities planned for “*Creating and Maintaining Awareness*” and “*Providing Thought Leadership and Advocacy*” in Figure 1 of the chairman’s statement, we recommend the IAESB to provide details of those activities planned under these two concepts.
- We also recommend explaining how the relatively new concept of “*Thought Leadership*” is used in

Figure 1. We are concerned that this may not be widely understood in non-English-speaking countries, and difficult to provide appropriate translation.

Juvenal

<b>Chairman's Statement</b>	I agree with comments.
<b>Preamble</b>	I agree with comments. I think that IFAC need to observe application of learned of accounting in the universities, principally International Standards, considering the importance of high quality, transparency and development of training for professional accountants (internal and external audit) and professors, for private and public sector organizations, universities, companies and governments.
<b>Strategic Context</b>	I suggest for the board, if agree, observes that new discussions in the regulators that can be modify parts or not of the standard, as for example Integrated Reporting <sup>1</sup> , Auditor Reporting <sup>2</sup> , Public Sector <sup>3</sup> and Global Reporting <sup>4</sup> .
<b>Acknowledgments</b>	I agree with comments.

Strategic Statement 2014 – 2016	I suggest for the board that observe the education, training of professional accountants in general and applied SMEs in relation audit services and international standards. I know that IFAC has a group for development this project, but in relation the education and considering the Declaration of G20 <sup>5</sup> , I think that is very important.
Our Higher Purpose	I agree with comments.
Our Mission	I agree with comments.
Implementation of Strategic Priorities and Work Plan	I agree with comments. I think that is very important observed the universities, the quality of learn and teach for directors, professors and students for accounting studies, principally in relation the international standards.

NZICA We believe that high-quality standards establish a level for member bodies to attain, and should not simply reflect (good) practice.

PWC The structure and repetitive nature of the strategy and work plan deflects from the key strategic priorities of the Board. It would help a reader of the document to have a concise and articulate list of priorities linked to specific tasks that will be undertaken. A number of the tasks set out in Appendix 1 are included at a high level and therefore it is hard for us to understand what is involved and to comment on whether it is the right direction for the Board.

As a specific example - It would be helpful to understand how the following areas are linked:

- How the IAESB serves the public interest - paragraph 7/ figure 2
- IAESB activities - figure 1 and
- Strategic priorities - paragraph 18.

#### **Chairman's Statement**

We feel this section of the strategy is unnecessary as the key points are set out in other areas of the Strategy.

Paragraph 7 (and later figure 2) highlights four ways in which the IAESB seek to serve the public interest. We are fully supportive of the need for a series of high quality education standards and implementation guidance to support these. However beyond this we struggle to understand what is driving the other three considerations and what specifically each will entail. For example what is involved in “developing education benchmarks for measuring implementation of the standards? “

In paragraph 9 it would be helpful to clarify what “*increasing capacity building in the accountancy profession*” means.

#### **Strategic Statement 2014**

It is unclear why there is a higher purpose, a mission and a strategy. We would suggest only having an overall mission, showing the strategic priorities that will be undertaken to support this.

#### **Implementation of Strategic Priorities and Work Plan**

It would be helpful to include the success measures that are to be used for each project and how these will be communicated to the public.

## VI Respondents

<b>ACRONYM</b>	<b>FULL NAME OF ORGANIZATION</b>
AAT	Association of Accounting Technicians, United Kingdom
ACCA	The Association of Chartered Certified Accountants
AICPA-PcEEC	American Institute of Certified Public Accountants' Pre-certification Education Executive Committee
ANAN	The Association of National Accountants of Nigeria
BDO International	BDO Global Coordination B.V.
CAI	Chartered Accountants Ireland
CGA-Canada	Certified General Accountants Association of Canada
CICPA	The Chinese Institute of Certified Public Accountants
CPA Canada	Chartered Professional Accountants of Canada
CPA-Ireland	CPA Ireland
DTT	Deloitte Touche Tohmatsu
EFAA	The European Federation of Accountants and Auditors for SMEs
EYG	Ernst & Young Global
FEE	Federation des Experts Comptables Europeens
HKICPA	Hong Kong Institute of Certified Public Accountants
ICAA	The Institute of Chartered Accountants in Australia
ICAN	Institute of Chartered Accountants of Nigeria
ICAEW	The Institute of Chartered Accountants in England and Wales
IDW	Institut der Wirtschaftsprufer
JICPA	The Japanese Institute of Certified Public Accountants
Juvenal	Denise Silva Ferreira Juvenal
NZICA	New Zealand Institute of Chartered Accountants
PWC	PricewaterhouseCoopers

SAICA	The South African Institute of Chartered Accountants
SAIPA	South African Institute Of Professional Accountants