



August 31, 2017

Submitted online: www.ifac.org with copy to davidmcppeak@iaesb.org

Mr. David McPeak
International Accounting Education Standards Board/International Federation of Accountants
529 5th Avenue
New York, NY 10017

Re: Exposure Draft Proposed International Education Standard IESTM 7: Continuing Professional Development (Revised)

Dear Mr. McPeak:

In collaboration with the CPA Center of Excellence[®], the Indiana CPA Society appreciates the opportunity to comment on the above-referenced exposure draft. These comments have no official status and do not represent the approval or disapproval of the exposure draft by the Indiana CPA Society or its Board of Directors.

Overall, we applaud and support the vision, direction, and long-term intent of the IESTM 7 Continuing Professional Development. We share the international community's commitment to professional education standards that preserve and strengthen the public's interest while providing timely, meaningful learning opportunities to professional accountants who desire to attain the highest level of technical competence, professional skills and professional values, ethics, and attitudes to best serve their clients and employers. We especially commend the recognition of the breadth and depth of skills required for professional accountants to competently perform in their expanding roles.

The Indiana CPA Society and the CPA Center of Excellence[®] ardently advocate to expand continuing professional development that is relevant to a professional accountant's role and professional responsibilities. We demonstrate our commitment to incorporating output-based education through publishing white papers, developing and piloting programs with practitioners and educators, supporting legislation and related regulations, and creating competency-based courses and learning opportunities that focus on acquiring and developing the individual's CPA core competencies.

We encourage innovation and broad discussion identifying CPD needs, both now and in the future, and appropriate measurement and monitoring by member bodies. It is critical to preserve flexibility and adaptability for professionals when determining CPD needs and methods of achieving them, and to not overprescribe what is required to meet the Standard. Measurement and monitoring should be premised on the professional's integrity, with member bodies focusing on reasonable record-keeping, measurement, and reporting.

You will find our specific comments to the exposure draft accompanying this letter. Thank you for considering our comments. We appreciate the time, collective wisdom, thought, and leadership that generated these proposed changes.

If you have a need for inquiry of our comments, please contact me at gbolinger@incpas.org (317) 726-5000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary M. Bolinger". The signature is fluid and cursive, written in a professional style.

Gary M. Bolinger, CAE
President & CEO
Indiana CPA Society

In collaboration with the CPA Center of Excellence®, the Indiana CPA Society provides the following comments to the Exposure Draft Proposed International Education Standard IES™ 7: Continuing Professional Development (Revised).

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1. Introduction: Scope of Standard 5. Page 14

5. CPD includes learning and development activities that contribute to the development and maintenance of professional competence, such as: (a) education, (b) training, (c) practical experience, (d) mentoring and coaching, (e) networking and sharing of knowledge and experiences, (f) observation, feedback, and reflective activity, (g) planned self-development activities, and (h) unstructured acquiring of knowledge.

We suggest changing (e) networking to (e) collaboration to support the concept of acquiring specific skills rather than simply the act interacting with others which is now commonly associated with the overused term of networking.

2. Measurement of CPD (Ref: Para.12) Page 15

In general, we encourage meaningful measurements that are not hours-based or related to hours-based measurements. It is critical to allow flexibility for member bodies to set appropriate parameters without losing focus of the intent to promote lifelong learning of the professional accountant. Learning that is ongoing, voluntary, and self-motivated pursuit of technical competence; professional skills; and professional values, ethics, and attitudes is inherently difficult to confine to narrow definitions and measurements.

3. Explanatory Material

Scope of this Standard (Ref: Para. 1–6) Page 16

A1. Professional competence is the ability to perform a role to a defined standard. Professional competence goes beyond knowledge of principles, standards, concepts, facts, and procedures; it is the integration and application of learning outcomes for: (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes which were achieved during IPD.

There is concern that the defined standard may not fully meet the concept of professional competence.

4. CPD for All Professional Accountants (Ref: Para.9) A9-A11 Page 17

We support the premises outlined in A9-A11, however we caution that the CPD requirements, maps and frameworks developed and used by member bodies not be too restrictive so as to prevent professional accountants the flexibility and adaptability to achieve competence.

5. Promotion of and access to CPD (Ref: Para. 10-11) A17 Page 18

It should be noted that this list (a-i) is not a comprehensive list, but is representative of examples ...

6. Measurement of CPD (Ref: Para. 12) A20 Page 19

We support the inclusion of: (b) professional accountants when undertaking self- appraisal; and (c) employers.

7. Monitoring and Enforcement of CPD (Ref: Para.15-17) Page 20

We believe the verifiable evidence under monitoring and enforcement of CPD needs to more closely aligned with **Introduction Scope of Standard (Ref: Para. A 5) on page 14**. Providing examples of verifiable evidence related to output based outcomes such as mentoring and coaching or practical experiences and unstructured acquiring of knowledge.