



14 March 2016

Mr David McPeak  
Technical Manager  
International Accounting Education Standards Board  
International Federation of Accountants  
545 Fifth Avenue  
14th Floor New York, New York 10017  
USA

Subject: Response to the IAESB Consultation on “Proposed Editorial Improvement to International Education Standards, Framework for International Education Standards for Professional Accountants and Aspiring Accountants, and IAESB Glossary of Terms”

Dear David,

ICAEW is a world leading professional membership organisation that promotes, develops and supports over 145,000 chartered accountants worldwide. We provide qualifications and professional development, share our knowledge, insight and technical expertise, and protect the quality and integrity of the accountancy and finance profession.

ICAEW generally believes that the IAESB should now act on a care and maintenance basis, and should not be issuing any further enhancements, publications, requirements, and consultations until professional accountancy organisations have had the chance to complete adoption and implementation of the revised IESs.

Nevertheless, ICAEW appreciates the opportunity to review the “Proposed Editorial Improvement to International Education Standards, Framework for International Education Standards for Professional Accountants and Aspiring Accountants, and IAESB Glossary of Terms” to ensure that the proposed editing and drafting changes maintain consistency and accuracy across the body of IESs and do not have any impact on the applicability of the standards.

ICAEW does not have any major objections to the proposed editing changes. However, professional accountancy organisations have to be certain that these proposed editing changes to certain key terms which have been redefined or expanded, such as Initial Professional Development (IPD) and professional competence, do not have an impact on the scope of the standards and do not require professional accountancy organisations to carry out extensive mapping to ensure that the syllabus and qualifications are not impacted.

ICAEW is concerned with the proposed objective of IES 1 (page 12) that the ‘objective of the IES is to establish educational entry requirements to professional accounting education programmes that are fair, proportionate, and protect the public interest’. It is unclear what interpretation stakeholders might place upon ‘protect the public interest’. We are concerned the phrase could be used to argue for a narrowing of the range of eligible entry routes, for instance insistence upon a relevant university degree.

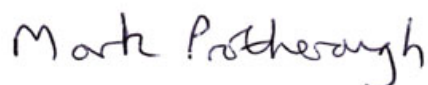
There is also a need for clarification on the proposed change to the definition of IPD (IES 3, on page 18). We believe that IPD should remain defined as 'IPD *includes* general education, professional accounting education...' and not that 'IPD *builds on* general education and includes professional accounting education...' This proposed edit conflicts with the definition of IPD stated for IES 5 (page 29), 'IPD *includes* general education, professional accounting education...'

A significant concern is the proposal (IES 1, page 24) to use the term 'applying' at a foundation level. There is a significant difference between 'recognising' the importance of a concept and 'applying' a concept. This can have implications for learning outcomes and therefore credit for prior learning policies.

Further clarification on the definition of complexity as a substitute for proficiency (Item 15, page 30) would also be useful, as this change may also impact the scope of practical experience. Proficiency and complexity are not synonymous, and further explanation could clarify the difference in proficiency versus complexity as a factor that affects the breadth of practical experience.

If you would like to discuss this response in more detail, please do not hesitate to contact Jonathan Jones, Director of Policy and Strategy, Learning and Professional Development, on [jonathan.jones@icaew.com](mailto:jonathan.jones@icaew.com) or +44 (0) 1908 248 292.

Yours sincerely,

A handwritten signature in dark ink that reads "Mark Protherough". The signature is written in a cursive, slightly informal style.

Mark Protherough  
Executive Director, Learning and Professional Development