



INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS OF UGANDA

Our Ref: T/11

14 September 2017

International Accounting Education Standards Board (IAESB)
529 5th Avenue
New York, NY 10017
United States

Dear Sir/Madam,

EXPOSURE DRAFT: (IES) 7, CONTINUING PROFESSIONAL DEVELOPMENT (REVISED)

We are grateful for the opportunity to provide comments on the proposed *International Education Standard (IES) 7, Continuing Professional Development (Revised)*.

Our detailed comments are provided in the attached appendix.

We hope that you will find our comments helpful.

Yours sincerely,

**SECRETARY/CEO
ICPAU**

ICPAU Response to IES7: CPD

The Institute of Certified Public Accountants of Uganda (ICPAU) is a national professional accountancy organization established in 1992 by an act of parliament to regulate and maintain the standard of accountancy in Uganda, and to prescribe and regulate the conduct of all professional accountants and in Uganda.

ICPAU is dedicated to serving the public interest by strengthening the profession and contributing to the growth and development of Uganda's economy. With over 2,000 members, ICPAU's membership represents accountants in public practice, education, government service, industry, and commerce.

ICPAU is very pleased to provide its comments to the IAESB in respect of the IES7 Exposure Draft.

1. Is the Objective statement appropriate and clear?

Yes, the Objective statement is appropriate and clear. The statement clarifies that it is the responsibility of the Professional Accountant to complete CPD in order to develop and maintain their professional competence.

2. Are the Requirements appropriate and clear?

With the exception of the following paragraphs, the requirements are appropriate and clear:

Paragraph 10

It is not properly written and its meaning is unclear. It should be redrafted to read "IFAC member bodies shall promote the importance of, and a commitment to, CPD **as a means of** development and maintenance of professional competence."

Paragraph 13

The ultimate goal of CPD is for professional accountants to achieve competence in a particular role. Learning outcomes as proxy for competence, is a lessening of the standard set in the existing IES 7.

Therefore, the proposed change to demonstrate the achievement of learning outcomes is less helpful to IFAC member bodies as it loses the link to the requirement for achievement and maintenance of professional competence.

Paragraph 14

The change to remove a specified, minimum requirement of CPD for the input method is unhelpful. Many IFAC member bodies follow the input method and may be adversely affected by this change.

The statement of an expected minimum requirement by IFAC is a helpful benchmark for all bodies using the input method. In addition, many regulators have specified a minimum requirement of input hours and IES 7 should reflect this where possible.

The lack of a specified minimum requirement may cause conflict between the member bodies and their regulators, especially where regulators have put in place a minimum number of CPD hours or points to be achieved by professional accountants.

3. Are there additional explanatory paragraphs required?

If no minimum requirement of hours is stated in the IES 7 requirements, detailed guidance should be provided to assist IFAC member bodies to establish what a sufficient amount of input CPD is.

The revised IES 7 appears to be weak regarding having a strong link to the CPD being relevant to the professional accountant's role. The explanatory material could also emphasise this further.

A9 could be improved by illustrating the CPD Framework as a diagram showing the continual feedback cycle.

A11 could be expanded to make greater reference to gathering feedback from a wider range of stakeholder groups in relation to the CPD required.

A12 could be expanded to refer to IFAC member bodies introducing mandatory requirements for CPD e.g. ethics.

4. Do proposed revisions to the output-based approach requirement and related explanatory materials improve your understanding and ability to apply an output-based measurement approach? If not what suggestions do you have to improve the clarity?

ICPAU is likely to continue to using a combination of the output and input-based approaches.

5. Are there any terms which require further clarification? If so, please explain the nature of the deficiencies?

No terms require further clarification.

6. Do you anticipate any impact or implications for your organization, or organizations with which you are familiar, in implementing the requirements included in the proposed IES 7

As noted at response 2 above, the proposed removal of a specified volume of CPD under the input method will have a significant impact on a number of IFAC member bodies and may lead to difficulties in implementing this revised IES.

7. What topics or subject areas should implementation guidance cover?

As noted at response 2 and 6 above, the proposed removal of a specified volume of CPD under the input method will have a significant impact on a number of IFAC member bodies and may lead to difficulties in implementing this revised IES. If the proposal is adopted, then detailed implementation guidance will be required to assist IFAC member bodies to implement this change in approach.