

Mr. David McPeak
Comments to the Proposed International Education Standard IES™ 7
Continuing Professional Development (Revised) Exposure Draft
C.P.C. MIGUEL ÁNGEL BOUZAS SAÑUDO

Question 1. Is the Objective statement of the proposed IES 7 appropriate and clear?

Answer 1. Yes, the Objective statement of the proposed IES 7 is appropriate and clear.

Question 2. Are the Requirements of the proposed IES 7 appropriate and clear?

Answer 2. Yes the Requirements of the proposed IES 7 are appropriate and clear.

Question 3. Are there any additional explanatory paragraphs needed to better explain the requirements of the proposed IES 7?

Answer 3. Yes in our opinion there are some explanatory paragraphs that should be better explain the requirements of the proposed IES 7.

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

Answer 4. Because of the results-based approach focuses on whether professional accountants can demonstrate achievement of learning outcomes. The measurement approach in some cases is subjective and not measurable in terms of an evaluation since the experience of these can't always be measured in a test, there are many areas of expertise that would not be practical to assess with written assessments and could not adequately determine compliance with CPD, the practical experienced is a perfect example that can't be expressed in a test and gives de professional accountant a huge asset.

Question 5. Are there any terms within the proposed IES 7 which require further clarification? If so, please explain the nature of the deficiencies?

Answer 5. Some of the penalties explained in the paragraph paragraphs may violate or lead to non-compliance with the rules derived from the way in which this is raised, of course that should be encouraged to comply with the rules but not in a coercive manner.

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

Answer 6. The fact that some IFAC member bodies may have the legal authority to expel non-compliant professional accountants or deny them the right to practice can be an extreme measure. The expulsion or denial of the right to practice may lead to the departure or aversion of some accountants to compliance with the rules and we believe that IFAC members should be given the freedom to establish corresponding penalties in a gradual manner and depending on the corresponding fault publication of names can act as a general deterrent to professional accountants and give a clear signal to the public of the profession's commitment to maintaining competition on high standards.

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

Answer 7.Proposals for the creation and evaluation of the different areas of professional accountants.

Within the implementation guide should be covering topics referring to the IFAC member bodies should establish the way of evaluating on an output basis the experience as part of the CPD, as well as a transition mechanism in order to be gradually helping professional accountants who are not complying with CPD in base to results.