

Comments on “Proposed Drafting Changes to IES, Framework for IES for Professional Accountants”

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The IASEB is to be congratulated on undertaking this thorough drafting of the Framework and the full suite of IESs. In general, I support the changes suggested in the document. The proposed editorial changes have resulted in more consistent terminology and language throughout the documents which has improved the clarity of the IESs. This will likely lead to more consistent application of the standards.

My comments are minor and are listed below.

General

The change to most of the Objective paragraphs make it clear that the focus of the Objective is the IES not the IFAC member body (see, for example, paragraph 7 of IES 1). However, I am not sure why this orientation was not carried through to IES 7, where the Objective paragraph still refers to the “objective of an IFAC member body is ...”.

Framework

Para 26.

Should “learning and development” be changed to “IPD”, as follows?

The extent to which the different types of learning and development are used may vary. For example, during the initial stages of IPD more emphasis may be placed on education including professional accounting education, than in later stages of IPD ~~learning and development~~. During CPD the balance may shift more to learning and development through practical experience and training.

Para 31

In line with the changes in terminology in IES6, should “measurement” be changed to “assessment”, as follows?

Assessment

~~Measurement~~ Assessment of professional competence developed throughout learning and development

IES 2

Para 1

The terminology has been changed to from “demonstrate” to “achieve”. Should “develop and demonstrate” in Para 6 also be changed to “achieve” for consistency?

(The same query can be applied to the equivalent paragraphs in **IES 3**. These equivalent paragraphs are numbered as 10 and 15 which appears to be an error in paragraph numbering. Note also that in **IES 8**, there is consistent terminology “develop and maintain” used in Para 1 and Para 7.)

Para 8

Can programs be designed to “achieve” learning outcomes? Or is it that programs are designed to assist aspiring professional accountants to achieve learning outcomes?

(The same query can be applied to the equivalent paragraph in **IES 3**, which is numbered as paragraph 17.)

IES 4

Paragraphs 19, 26 and 29 (my copy of IES 4 starts at para 19)

“Achieve” is used in para 19, “develop and demonstrate” in para 26 and “to be achieved” in para 29. The wording across these three paragraphs should be consistent.

Para A16

Should “subject” be changed to “course or subject”, to be consistent with Para A18?

IES 5

Para 33

This first Scope paragraph refers to “the practical experience that aspiring professional accountants are required to complete”, whereas Para 41 (the Objective) refers to “the practical experience that is sufficient for aspiring professional accountants”. I am not sure why these two expressions would differ. Should the wording be changed to be more consistent?

IES 6

Para 52 - Scope

There appears to be some errors in the new wording of this paragraph, which makes it difficult to understand:

This International Education Standard (IES) prescribes the requirements for the assessment of professional competence of aspiring professional accountants are required to demonstrate by the end of Initial Professional Development (IPD).

Should it read?

This International Education Standard (IES) prescribes the requirements for the assessment of professional competence that ~~of~~ aspiring professional accountants are required to demonstrate by the end of Initial Professional Development (IPD).

Para 58.

Wording in the Objective paragraph has now been changed as follows:

The objective of this IES is to establish how to assess whether aspiring professional accountants have achieved an appropriate level of professional competence, in order to perform a role as a professional accountant.

The term “establish how to assess” is a little awkward, so a suggested change is as follows:

The objective of this IES is to establish ~~how to assess~~ ways of assessing whether aspiring professional accountants have achieved an appropriate level of professional competence, in order to perform a role as a professional accountant.

Para A4

The new wording is as follows:

Establishing how to assess whether aspiring professional accountants have achieved an appropriate level of professional competence by the end of IPD serves several purposes. It protects the public interest, enhances the quality of the work of professional accountants and promotes the credibility of the accounting profession.

Again this reads a little awkwardly. Perhaps a better wording is:

~~Establishing how to assess~~ Assessing whether aspiring professional accountants have achieved an appropriate level of professional competence by the end of IPD serves several purposes. It protects the public interest, enhances the quality of the work of professional accountants and promotes the credibility of the accounting profession.