

15 March 2016

Mr David McPeak
Senior Technical Manager
International Accounting Education Standards Board
International Federation of Accountants
277 Wellington Street West, 4th Floor
Toronto, Ontario
M5V 3H2
Canada

Dear David,

**Exposure Draft (December 2015)
Proposed Drafting Changes to International Education Standards, Framework for
International Education Standards for Professional Accountants and Aspiring
Accountants, & IAESB Glossary of Terms**

The Institute of Singapore Chartered Accountants appreciates the opportunity to comment on the Proposed Drafting Changes to International Education Standards, Framework for International Education Standards for Professional Accountants and Aspiring Accountants, & IAESB Glossary of Terms.

We agree that majority of the proposed changes are editorial in nature, enhancing consistency and clarity across the IESs. However, we have noted some inconsistencies and have suggested amendments to further align the IESs.

Our comments on the exposure draft are set out in the attachment. If you require any clarification on the comments, please contact Lee Zhen Ni, Manager of Examinations & Qualification, at zhenni.lee@isca.org.sg or +65 6597 5690.

Yours faithfully,



GOH PUAY CHEH
Chief Operating Officer
Institute of Singapore Chartered Accountants

General Comments:

We would like to commend IAESB for the immense efforts that were taken in the maintenance review process to improve consistency and clarity of the suite of 8 IESs which were developed and released over a period of 4 years.

In general, we agree that majority of the proposed editorial improvements in Appendix A and B of the Exposure Draft are limited to:

- (i) Terminology changes, matters of language, or drafting issues;
- (ii) Minor changes necessary to maintain consistency and accuracy across the IESs; and
- (iii) Not expected to impact on users of the standard.

However, we have noted inconsistencies in some proposed changes. Please see **Appendix 1** for more details.

Appendix 1

| # | Standard | Paragraph | Proposed change by IAESB | Comments by ISCA | Suggested amendments |
|---|----------------------|-----------|---|--|---|
| 1 | IES 2, 3, 4, 5, 6 | | | We note the numbering of Paragraphs in IES 2, 3, 4, 5 and 6 (Appendix B) are continuous which should not be the case. | IFAC to ensure that the Paragraphs in each IES are numbered independently, for clarity. |
| 2 | IES 2 | 6 | The objective of this IES is to establish the technical competence that aspiring professional accountants need to develop and demonstrate by the end of IPD , in order to perform a role as a professional accountant. | We would like to clarify the reason that IAESB has deleted the phrase “by the end of IPD” from the “Objective” paragraphs of IES 2, 3 and 4. This seems to be inconsistent with the remaining paragraphs in IES 2, 3 and 4 which still include this phrase. | The objective of this IES is to establish the technical competence that aspiring professional accountants need to develop and demonstrate by the end of IPD , in order to perform a role as a professional accountant. |
| 3 | IES 2 | A7 | Establishing the technical competence that aspiring professional accountants need to develop and demonstrate, 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. | Please see list of paragraphs which still include this phrase: IES 2: Paragraphs 3, 7, A8, A11 and A13 IES 3: Paragraphs 3, 7, A10, A13 and A16 IES 4: Paragraphs 5, 11, A17, A20 and A32 | Establishing the technical competence that aspiring professional accountants need to develop and demonstrate, 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. |
| 4 | IES 3 | 6 | The objective of this IES is to establish the professional skills that aspiring professional accountants need to develop and demonstrate by the end of IPD , in order to perform a role as a professional accountant. | In addition, the objective statement of IES 5 (Paragraph 10) and explanatory materials (Paragraphs A5 and A6) does not include “by the end of IPD”. | The objective of this IES is to establish the professional skills that aspiring professional accountants need to develop and demonstrate by the end of IPD , in order to perform a role as a professional accountant. |
| 5 | IES 3 | A9 | Establishing the professional skills that aspiring professional accountants need to develop and demonstrate, by the end of IPD serves several purpose. | <i>In view that IES 2, 3, 4 and 5 relate to the competence areas that aspiring professional accountants need to develop and demonstrate during Initial</i> | Establishing the professional skills that aspiring professional accountants need to develop and demonstrate, by the end of IPD serves several purpose. |

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|---|----------|-----------|---|--|---|
| | | | It protects the public interest, enhances the quality of the work of professional accountants and promotes the credibility of the accounting profession. | <i>Professional Development (IPD), suggest to reinstate / add the phrase "by the end of IPD" in the "Objective" paragraphs, for consistency.</i> | It protects the public interest, enhances the quality of the work of professional accountants and promotes the credibility of the accounting profession. |
| 6 | IES 4 | 8 | The objective of this IES is to establish the professional values, ethics, and attitudes that aspiring professional accountants need to develop and demonstrate by the end of IPD in order to perform a role as a professional accountant. | | The objective of this IES is to establish the professional values, ethics, and attitudes that aspiring professional accountants need to develop and demonstrate by the end of IPD in order to perform a role as a professional accountant. |
| 7 | IES 5 | 10 | The objective of an IFAC member body this IES is to establish practical experience that is sufficient practical experience required for aspiring professional accountants to perform a role of as a professional accountant. | | The objective of this IES is to establish practical experience that is sufficient for aspiring professional accountants to perform a role as a professional accountant by the end of IPD. |
| 8 | IES 5 | 6 | After the completion of IPD, practical experience may be required to bring professional accountants to a level of professional competence needed for other roles, such as (a) that of a statutory auditor, (b) other forms of specialization, or (c) those roles that are regulated. In addition, all Practical experience is part of lifelong learning that professional accountants engage in undertake lifelong learning to continue to develop and maintain professional competence relevant to their role during CPD. Changes in the | There is inconsistency between Appendix A Proposed change for IES 5 Paragraph 6 (Page 28) with Appendix B IES 5 Paragraph 6 (Page 96). <i>Suggest to adopt the words in Appendix B IES 5 Paragraph 6 (Page 96).</i> | After the completion of IPD, practical experience may be required to bring professional accountants to a level of professional competence needed for other roles, such as (a) that of a statutory auditor, (b) other forms of specialization, or (c) those roles that are regulated. Practical experience is part of lifelong learning that professional accountants engage in undertake lifelong learning to develop and maintain professional competence relevant to their role during CPD. Changes in the working environment, |

| # | Standard | Paragraph | Proposed change by IAESB | Comments by ISCA | Suggested amendments |
|---|----------|-----------|---|---|---|
| | | | working environment, career progression, or new roles may require that professional accountants increase their level of professional competence and acquire new competences. This is covered in (see IES 7: Continuing Professional Development (2014)). | | career progression, or new roles may require that professional accountants increase their level of professional competence and acquire new competences. This is covered in IES 7: Continuing Professional Development (2014). |
| 9 | IES 5 | A1 | <p>An aspiring professional accountant is an individual who has commenced a professional accounting education program as part of IPD. The inclusion of practical experience in IPD lays the base for the ongoing development of professional competence throughout the professional accountant's career. IPD is the learning and development through which aspiring professional accountants first develop competence leading to performing a role as a professional accountant. IPD includes general education, professional accounting education, practical experience, and assessment. IPD continues until aspiring professional accountants can demonstrate the professional competence required for their chosen roles in the accountancy profession.</p> | <p>This proposed updated paragraph is not worded consistently with other similar proposed updated paragraphs in IES 2 (Paragraph A1), 3 (Paragraph A1) and 4 (Paragraph A3).</p> <p>Please see suggested amendment.</p> | <p>An aspiring professional accountant is an individual who has commenced a professional accounting education program as part of IPD. IPD is the learning and development through which aspiring professional accountants first develop competence leading to performing a role as a professional accountant. IPD includes builds on general education and includes professional accounting education, practical experience, and assessment. IPD continues until aspiring professional accountants can demonstrate the professional competence required for their chosen roles in the accountancy profession.</p> |

| # | Standard | Paragraph | Proposed change by IAESB | Comments by ISCA | Suggested amendments |
|----|----------|-----------|---------------------------------|--|---|
| 10 | IES 7 | 5 | No proposed change (Appendix A) | To align the words with the proposed change from “reflection” to “reflective activity”, which is consistent with the IAESB Glossary of Terms, we suggest similar update to IES 7 Paragraph 5. Please see suggested amendment. | In addition to education, practical experience, and training, CPD also includes learning and development activities, such as (a) coaching and mentoring, (b) networking, (c) observation, feedback, and reflection reflective activity , and the (d) self-directed and unstructured gaining of knowledge. |

Examinations & Qualification Department
Institute of Singapore Chartered Accountants
15 March 2016