



14 July 2024

## Proposed Revisions to IES 6 – Initial Professional Development – Assessment of Professional Competence.

### ***‘A fair assessment measures the professional competence of an accountant’.***

We are pleased to respond with our humble comments on the changes to ED-IES 6.

We appreciate your leadership. We know that the process of putting together an IES is a more difficult task than to comment. Your end point becomes our starting point. Therefore, we admit our limitations as we comment scrupulously.

We realize that responding to the internal and external issues and putting in place a fair and robust assessment is a continuing task for the IFAC members.

We support your emphasis on workplace assessment as a format for delivery of assessments activity and portfolio of evidence on completion of workplace activities<sup>1</sup> featuring in the ED-IES6. We encourage you to come up with implementation support on the workplace training<sup>2</sup> and assessment by employers. It is a rather neglected aspect in many parts of the world necessary for the qualification.

Locator: [Summary](#), [Q1](#), [Q2](#), [Q3](#), [Q4](#),

A summary of few of our recommendations are as follows-

1. Make the Code of Ethics applicable to assessors. A professional accountant is bound by the Code of Ethics. Like the representatives of professional accountant, the representatives of the institutions, assessing aspiring accountants, shall also be bound by the same principles of the code of ethics.
2. Missing link. Professional competence is one of the principles of the Code of Ethics. An aspiring accountant is assessed through the principles stated in this IES. The assessment under IES6 is a stepping stone for a professional accountant for maintaining professional competence. A statement linking all is missing.
3. Be fair. Assessment of professional competence should be fair and without bias. The principle of equity comes foremost in formal assessment. It should stand-alone, not with the principles of accessibility and inclusion at the end.
4. The process of assessment should be made transparent with mechanisms to remove any impression of a whimsical design of assessment.
5. Verifiable evidence applicable to design, evaluation and overseeing the process of assessment?

<sup>1</sup> Para A6(e) and A5 and A22(b)

<sup>2</sup> A9



6. Explicit reference in the Standard. Para A1 of the ED-IES6 should be promoted as a part of the Standard rather than Explanatory Material.
7. Housekeeping. Public interest and understanding makes us suggest purging irrelevant text, changes to simplify the text, and also mention what is missing.

Back to [Summary](#)

Question 1. Do you support the proposed revisions to IES 6? If not, please explain your reasons and indicate what changes you would suggest.

R1. We understand that the Explanatory Memorandum adds four principles of assessment. Changes made in the Standard part and the Explanatory Material.

The Board may have considered seeking comment on each principle and major change separately. Specific feedback on identified major changes may have been much better.

We support the process of change in the ED-IES 6. However, we regard some proposed changes to be incomplete. The ED-IES6 is silent on some issues.

Our comments are as follows:

1.1 Assessment is a recurring activity>> The ED-IES6 is addressed to the IFAC bodies (para 2). It states:

‘IFAC member organizations have a responsibility to assess whether aspiring professional accountants have achieved the required level of professional competence by the end of IPD’.

We propose the following wording instead:

*‘The IFAC member bodies are responsible to put in place a process of assessment the outcome of which is a professional accountant.’*

1.2 Make Section 110 of the Code applicable to the assessors>> What is the role of the five fundamental principles of the Code of Ethics<sup>3</sup> in assessments<sup>4</sup>? The principles that bound aspiring and professional accountants shall also bounds those responsible for the design, delivery and oversight of assessment activities. The reason for our inquiry was that IES 6 is addressed to the IFAC Members.

---

<sup>3</sup> Five fundamental principles of ethics: integrity; objectivity; professional competence and due care; confidentiality; and professional behavior. Section 110. IESBA Handbook of the International Code of Ethics for Professional Accountants (including International Independence Standards) – 2018 Edition.

<sup>4</sup> IES4, para 10



How is it possible that IFAC Members make others comply with a code of ethics which do not bound them publicly? The public interest is common to the assessor and assessed and IFAC<sup>5</sup>.

There is no explicit connection between those responsible for assessment activities and the Code in the ED-IES6.

1.3 Attain (and maintain) professional competence>>Coming back to the five fundamental principles of code of ethics applicable to the professional accountant, is the 'attain(ing)' of professional competence and due care stated there is the same of which assessment is being made<sup>6</sup>? If so, why the two are not aligned and connected?

1.4 Objective of the ED-IES6 inconsistent with the other IES. We propose changing the objective in our response to [Question 3](#).

1.5 First things first: Professional competence compass as standard>> The systematic structure of the IES imply that the professional competence is about technical competency, professional skills, and professional values, ethics and attitude. When it comes to the assessment, the term should explicitly encompass all three. It is there in para A1 of IES 6 and in IES 4<sup>7</sup>.

We recommend placing the text of IES 4 para A6 as a part of the Standard n IES6.It is the substance of the ED-IES6I. It broadens the meaning of professional competence to encompass the three earlier IES.

1.6 Prevailing principle in case of conflict in applying principles of assessment?>> Is the listing of principles in order of its priority? ED-IES6 must provide guidance if the application of all the principles of assessment are equal in priority? The IES6 does not provides any guidance in case the application of principles of assessment results in a conflict. Which principle prevails over the other, in case of a conflict? Also see [Question 4](#)

---

<sup>5</sup> Section 100.1 of the Code. IFAC..... 'serves the public interest by working with our member organizations to help ensure a skilled, knowledgeable, and ethical workforce of professional accountants around the world'...'About the IFAC' in the ED before 'Request for Comments'.

<sup>6</sup> Section 110. 1A1 (i) 'Attain and maintain professional knowledge and skill at the level required...' IESBA 2021.

<sup>7</sup> Professional competence goes beyond knowledge of principles, standards, concepts, facts, and procedures; it is the integration and application of (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes. Para A6. IES4.



1.7 Pervasive principle>> The principle of equity appears to be pervasive in all other principles to result in an effective assessment.

1.8 No absolute measure?>> IES6 specifies that no principle is to be an absolute measure. Its difficult to understand when IES6 says that a particular principle is not an absolute measure. Is that to mean an assessment can do without the presence of a principle in assessment?

For example, it is mentioned that reliability<sup>8</sup>, equity<sup>9</sup>, validity<sup>10</sup>, transparency<sup>11</sup>, sufficiency<sup>12</sup>, or accessibility, equity and inclusion<sup>13</sup> on its own is not an absolute measure.

We find this deviating from our stand on the public interest?

1.9 Require verifiable evidence for the design of assessment>> The requirement of verifiable evidence must be equally applicable to the assessors for the design of assessment. The examples of verifiable evidence in the ED-IES6 given are related to the outcome than design of assessment<sup>14</sup>. ED-IES6 admits that <sup>15</sup> 'other stakeholders may provide substantive input into assessment activities.'<sup>16</sup> The requirement of verifiable evidence must be applicable to them.

---

<sup>8</sup> See para A11

<sup>9</sup> Para A15

<sup>10</sup> Para A17

<sup>11</sup> Para A19. This reminds us about the reversal of this principle of transparency in the Annual Reports of the Institute of Chartered Accountants of Pakistan. About a few years ago, every Annual Report carried statistics about the status of enrolled 'students'. In its Annual General Meetings, I consistently raised question about active students and why a majority of our students fail to pass the exams? The exam status of total registered students? The student pass rate of the individual papers, like how many appeared and how many passed? When this information about the students was omitted from Annual Report, I was told that It is confidential and no more of interest to the Members. Since then the recent Annual Report contains scant references to students, whereas the welfare of the profession remains tied to the students. They also contribute most to the Institute funds. Our pass rate are pathetic and majority of students never make it to the finals.

<sup>12</sup> Para A21

<sup>13</sup> Para A23

<sup>14</sup> Para A26

<sup>15</sup> 'this IES may be helpful to educational organizations, employers, regulators, government authorities, and any other stakeholders who support the learning and development of aspiring professional accountants'. Para 2 IES6. 'other stakeholders may provide substantive input into assessment activities. Para A2 of the Explanatory Material.

<sup>16</sup> Para A25 is about regulators of IFAC member bodies whereas IFAC member bodies may be the regulators of other stakeholders involved in assessment Para A2. Para A25 'Basing the assessment of learning outcomes on verifiable evidence may satisfy the needs of third parties who oversee or regulate an IFAC member body.'



1.10 Valueless changes: replacing and adding words without further explanation>>  
Some words are replaced, as in the case of ‘organizations’ replacing IFAC bodies<sup>17</sup>. Similarly, in the case added as in ‘formal’<sup>18</sup> before assessment<sup>19</sup>. Since no concept of informal assessment in the IES 6, we found it difficult to justify its use. In these both cases, use of these words do not add-value to the text as such.

1.11 Simplify para 5 of ED-IES6<sup>20</sup>>> Para 5 may read as follows:

Refer to e Glossary of Terms for International Education Standards (201920XX for the key terms used in this IES.<sup>21</sup>

Delete the irrelevant text in the present form as follows-

~~Definitions and explanations of the key terms used in the IES and the Framework for Professional Accountants and Aspiring Professional Accountants (20152019) are set out in the International Accounting Education Standards Board (IAESB) Glossary of Terms for International Education Standards (201920XX).~~

Highlight terms of Glossary>> The terms included in the Glossary must be defined and distinguished in the text of the ED-IES6. For example, the meaning of the principle of equity is not to be found in the ED-IES6 but in the Glossary. Without access to the Glossary you cannot get what equity means in assessment. This IES should be stand-alone document for the user. Referring Glossary to understand the principles in the ED-IES6 is inappropriate. Also see [Question 3](#)

1.12 Additional matters>>

1. We recognize the significance of the statement as a footnote which is deleted in ED-IES6: Learning and development is, however, an ongoing process of developing and maintaining professional competence throughout the career of a professional accountant, and so continues through Continuing Professional Development (CPD).<sup>22</sup>

<sup>17</sup> The word ‘organization’ (as written in US but not all over the world) substituted for ‘bodies’ 148 times in the mark-up and clean text. Similarly, its singular word ‘body’ substituted by ‘organization’ for 66 times. The term member ‘bodies’ is widely used. The term ‘body’ is not there in its biological sense! We recommend the use of “IFAC Members” or ‘individual IFAC Member’ instead.

<sup>18</sup> The word ‘formal’ used 74 times in the mark-up and clean text. It’s like stating the obvious.

<sup>19</sup> The term ‘Assessment’ in the title has been left without being ‘Formal’

<sup>20</sup> Also IES2 para 4, IES4 para 6.

<sup>21</sup> Key terms in this IES defined in the Glossary may be in italics or bold text to make them distinct.

<sup>22</sup> See para 3 of the current IES 6. Para A3 first sentence is equivalent.



2. Para 4 of the ED-IES6 may be omitted or at best given as a footnote. Its present form distracts and is irrelevant for the general user.<sup>23</sup>

Back to the [Summary](#)

Question 2. Do you find the revisions to the IES 6 Explanatory Material to be helpful? If not, please explain your reasons and indicate what changes you would suggest.

R2. Our reservations follow:

2.1 Equity>> We agree with including the additional principles of formal assessment. However, ED-IES6 undermines the principle of equity: because it is proposed to be included with the principles of accessibility and inclusion.

Equity stood alone before the deletion of para A15 of the current IES6. Equity and fairness go together. Fairness as in fair presentation of a financial statement, fair value estimates, fair professional accounting education program, learning outcome is fair, IES are fair, and above all a fair professional accountant.

2.2 Quotes from other IESs>>Statements quoted from other IES must be properly referenced. For example the following statement is identical to IES4 para A6:

Professional competence goes beyond knowledge of principles, standards, concepts, facts, and procedures; it is the integration and application of (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes.

Another example is where ED-IES6 para A4 quotes IES4 para A11 in part.

2.3 Purge unnecessary and irrelevant text>> Every effort should be made to purge irrelevant text. For example para A3<sup>24</sup> last two sentences.

2.4 ~~Within these IESs,~~ Professional competence is the ability to perform a role to a required standard. Professional competence goes beyond *experience and* knowledge

---

<sup>23</sup> This IES specifies requirements for the assessment of professional competence, while: • IES 2, Initial Professional Development – Technical Competence (201520XX), IES 3, Initial Professional Development – Professional Skills (201520XX), and IES 4, Initial Professional Development – Professional Values, Ethics, and Attitudes (201520XX), specify assessment requirements relevant to their areas of focus within IPD; and • IES 5, Initial Professional Development – Practical Experience (2015), specifies requirements for the assessment of practical experience.

<sup>24</sup> ~~Professional accountants continue to engage in lifelong learning to develop and maintain professional competence relevant to their role during CPD. Changes in the 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 IES 7, Continuing Professional Development (2020)~~. Placing this text at the beginning appears to be unjustified and unnecessary. The topic of IES6 is assessment, not CPD.



of principles, standards, concepts, facts, and procedures; it is the integration and application, ~~including practical experience (as defined in IES 5),~~ of (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes<sup>25</sup>. ~~as defined in IES 2, IES 3 and IES 4, respectively.~~

~~2.5 During IPD, assessment may be designed, delivered, and overseen by a range of stakeholders, including the IFAC member body, employers, regulators, licensing bodies, universities, colleges, and private education providers. Although t~~ The assessment of professional competence during IPD is the responsibility of IFAC member organizations. , ~~o~~Other stakeholders may provide substantive input into assessment activities. *Assessment during IPD may be designed, delivered, and overseen by a range of stakeholders, including the IFAC member body, employers, regulators, licensing bodies, universities, colleges, and private education providers.*

2.6 Professional accountants ~~continue to~~ engage in lifelong learning to develop and maintain professional competence relevant to their role during CPD<sup>26</sup>. ~~Changes in the 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 IES 7, Continuing Professional Development (2020).~~

2.7 We do not appreciate the verbosity in the text of the Explanatory Material when a sentence begins with repeating a known subject in each instance, as in A12<sup>27</sup> where the text strike out is repeated five times:

A12. There are many ways that assessment activities can be designed and delivered to increase reliability. For example: (a) ~~The reliability of an assessment may be increased by~~ avoiding the use of ambiguous wording in assessment questions or instructions; (b) ~~The reliability of an assessment may be increased by~~ undertaking an internal or external review of the content of the assessment before it is finalized; (c) ~~The reliability of an assessment may be increased by~~ using psychometric modelling; (d) ~~The reliability of an assessment may be increased by~~ selecting appropriate assessors, having an assessment rubric or marking guide, and by providing assessor training; and (e) When using technology to deliver assessments, ~~the reliability of an assessment may be increased by~~ ensuring the reliability of the assessment technology, including checking the stability and adequacy of the technology and the user interface.

2.6 Readability>> We recommend an overall effort to improve the readability of IES6 Explanatory Material. The tone and text of the EM may be simplified.

<sup>25</sup>As defined in IES 2, IES3, IES4 respectively.

<sup>26</sup> IES 7, Continuing Professional Development (2020).

<sup>27</sup> Similar verbosity in A14 (~~The authenticity of an assessment may be increased by~~), A16, A18, A24. Also see A10 where principles of assessment repeated twice in a para. Para A23 is so difficult to read.



Back to [Summary](#)

Question 3. Do you find the revisions to the Glossary and Conforming Amendments to be helpful? If not, please explain your reasons and indicate what changes you would suggest.

R3. We recommend placing terms in the ED-IES6 in one place.

3.2 Distinguish terms of Glossary>> The text of terms in ED-IES6 may appear in one place or is in bold or italics to alert users of its inclusion in the Glossary.

3.3 Conforming amendments to other IES: Objective>> We do not find the objective of the IES-6 to reflect its contents.

For example, we find the objective of IES1 para 7 more suitable (but incompatible with the ED-IES6), as follows:

The objective of this IES 1 is to establish educational entry requirements to professional accounting education programs that are fair, proportionate, and protect the public interest.

We suggest the following as the objective of ED-IES6:

*The objective of IES6 is to establish a process of assessment to enable aspiring accountants to become professional accountants by IFAC members. The outcome of the assessment process must be fair, proportionate and protects public interest.*

Alternatively,

*The objective of IES6 is to establish an assessment process for the aspiring accountants to become professional accountants which is fair, proportion and protects public interest.*

The assessment process provides an opportunity to the aspiring accountant to demonstrate the required level of professional competence.

Professional competence is the ability to perform the role of a professional accountant.

Professional competence goes beyond knowledge of principles, standards, concepts, facts, and procedures; it is the integration and application of (a) technical competence, (b) professional skills, and (c) professional values, ethics, and attitudes.

The present objective of the ED-IES is as follows:

~~7. The objective of this IES is to establish whether aspiring professional accountants have demonstrated the required level of professional competence by the end of IPD in order to perform a role as a professional accountant.~~

3.4 Conforming amendment to IES 1, para 1: Purge the irrelevant text as shown below:





1. International Education Standard (IES) 1 prescribes the principles to be used when setting and communicating educational requirements for entry to professional accounting education programs., while requirements relating to entry to the profession are covered by: (a) IES 2, Initial Professional Development—Technical Competence (2021), (b) IES 3, Initial Professional Development—Professional Skills (2021), (c) IES 4, Initial Professional Development—Professional Values, Ethics, and Attitudes (2021), (d) IES 5, Initial Professional Development—Practical Experience (2015), and (e) IES 6, Initial Professional Development—Assessment of Professional Competence (201520XX).

Back to [Summary](#)

Question 4. Do you believe that the adoption and implementation of the proposed revised IES 6 will present any challenges to your organization? If yes, what challenges do you foresee?

R4 We expect that some of the aspects of the ED-IES6 will be difficult to implement.

4.1 Resolving conflicts when applying principles>> The application of so many principles in an assessment is bound to result in conflicts. There is no guidance on the proposed action in case of conflicting outcomes of the application of the principle of assessment. Resolving such situation would be a challenge for IFAC members and other stakeholders.

Priority>> The priority in which the principles of assessment are to be applied is not clear. Do they command equal priorities over each other?

These matters are likely to present a challenge in applying ED-IED6.

Also see [here](#).

4.2 No mention>> The ED-IES6 is silent on many aspects fundamental to the nature of assessment. If the professional accountants go through a uniform system why there exists wider differences in the knowledge and professional competencies of individuals and among IFAC members? A statement for general user was suffice that the purpose of assessment is not to have professional accountants with a uniform level of professional competence but a minimum required level of professional competence. Each IFAC member has its own minimum required standard.

About the nature of assessment. The design, its evaluation and outcome of an assessment activity may vary from one attempt to another. Not necessary that a person declared successful will be so in the next attempt of the same paper.

The matters here need clarity for the general understanding in the public interest.



4.3 The mechanism of Self-correction>> The ED-IES6 is silent about resolving errors that may creep in the evaluation mode of assessment.

When we know no one is error-free no forum provided to the near-miss aspiring accountants to initiate a review which is relatively independent of those involved in the assessment?

An example of the transparency that may be cited is the capacity of the assessment process of self-correction.

We consider this mechanism as presenting a challenge.

4.4 Availability of forum to take up the faulty design, flawed questions or errors in the assessments. The authorities must collect a feedback from the aspiring accountants on the components of assessment on the spot<sup>28</sup>. There is a possibility of flawed question or error in the assessment. The ED-IES6 must provide for an independent forum / layer to process such feedback and make changes in assessment, if necessary.

Appoint Referees>> Recognize as a stakeholder the right of those appearing in assessment activity with design defects. Those appearing in the assessment have access to those responsible for designing it and independents if necessary.

4.5 Measures to strengthen the system of assessment>> Changing conditions like technology constantly demand changes in the administration of assessment. The concept of continued improvement is there. The IFAC members must constantly respond to the change in the culture, technology, needs of the society.

For example, written policies must govern the process of assessment. The process of assessment is made up of design, its evaluation and outcome. All of these aspects must be in a documented form, capable of resolving any conflict in case of its application.

Responding to the changes around with the right measures will present a constant challenge for IFAC members.

---

<sup>28</sup> We recall an incident in an overseas professional examination where such feedback was collected as a matter of routine by allocating fifteen minutes after it. I remember not doing well in one of the papers where a critical piece of information was left to be assumed, whereas I thought that was misguiding on the part of examiner.



4.6 Management of the assessment publicly available<sup>29</sup>. We are not sure what is meant by the 'management of the assessment'? The management of the assessment process going public is more understandable.

4.7 Workplace assessments<sup>30</sup> need elaboration for implementation. A workplace is instrumental in developing an aspiring accountant. Workplace assessments require aspiring accountants to demonstrate professional competence across a wide range of situations. How is this possible in a public practice setting without breaching the client confidentiality?

4.8 An assessment is a recurring process. The required level to be a professional accountant varies. The one who clears it once may not do so always.

4.9 Distortions in the design of assessment. When information is incomplete. Time and marks are not correlated. Candidates get a 4 mark question that requires half an hour to respond in most cases. Such situations present a challenge to assessors and reviewers.

We dedicate our efforts to the goodness of our fellow humans who take care of fellow humans in need.

---

<sup>29</sup> A20 (c) Transparency may be increased by making information relating to the development, grade distribution, and management of the assessment publicly available.

<sup>30</sup> Para A22(b)