



## IES EXPOSURE DRAFT: RESPONSE TEMPLATE

### RESPONSE TEMPLATE FOR THE ED OF THE PROPOSED REVISIONS TO IES 6 – INITIAL PROFESSIONAL DEVELOPMENT – ASSESSMENT OF PROFESSIONAL COMPETENCE

#### Guide for Respondents

Comments are requested by **July 24, 2024**.

This template is for providing comments on the Exposure Draft (ED) of proposed revisions to International Education Standard 6 – Initial Professional Development – Assessment of Professional Competence, in response to the questions set out in the Explanatory Memorandum (EM) to the ED. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate IFAC's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
  - Respond directly to the questions.
  - Provide the rationale for your answers. If you disagree with the proposals in the ED, please provide specific reasons for your disagreement and specific suggestions for changes that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for IFAC to be made aware of this view.
  - Identify the specific aspects of the ED that your response relates to, for example, by reference to sections, headings or specific paragraphs in the ED.
  - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IFAC website.

[Use the “Submit Comment” button on the ED web page to upload the completed template.](#)

**Responses to IFAC’s Request for Comments in the EM for the ED, Proposed Revisions to IES 6 – Initial Professional Development – Assessment of Professional Competence**

**PART A: Respondent Details and Demographic information**

Your organization’s name (or your name if you are making a submission in your personal capacity)	Hong Kong Institute of Certified Public Accountants
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Kit Wong
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	kitwong@hkcipa.org.hk
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ED). Select the most appropriate option.	<a href="#">Asia Pacific</a>
	If “Other”, please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ED). Select the most appropriate option.	<a href="#">Member body and other professional organization</a>
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** IFAC’s preference is that you incorporate all your views in your comments to the questions (also, the last question in Part C allows for raising any other matters in relation to the ED).

**Information, if any, not already included in responding to the questions in Parts B and C:**

## PART B: Responses to Specific Questions in the EM for the ED

**For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.**

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

**Overall response:** [Agree, with comments below](#)

**Detailed comments (if any):**

*We support the four new principles of assessment – authenticity, integrity, accessibility, and inclusion – taken in the IES 6.*

- *Authenticity: The aspiring professional accountants are facing a rapidly changing work environment; thus assessment based on realistic situations, complexity of work environment and tasks incorporated with technology could be used to train and evaluate their necessary professional competence.*
- *Integrity: With the rapid development of artificial intelligent, the high level of integrity for aspiring professional accountants becomes important, especially when online assessments are popularly incorporated into the initial professional development system worldwide. Increasing security in deploying the formal online assessments is a key priority to consider in order to safeguard the reputation of both aspiring professional accountants and education system.*
- *Accessibility and inclusion: The initial professional development system is the cornerstone of the future development of professional accountants in Hong Kong. We are striving to provide equity through measuring achievement, fairness and opportunities in the training of aspiring professional accountants. In order to allow aspiring professional accountants to continuously pursue of higher professional development and to show their competence without any restrictions relating to their special educational needs, a flexible and transparent assessment system is required to help talented students realise their potentials to be a professional accountant without bias and barriers posed in the assessment.*

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.

**Overall response:** [Agree, with comments below](#)

**Detailed comments (if any):**

*The IES 6 Explanatory Material set out criteria to assess the aspiring professional accountants in response to the rapidly changing professional environment. The IES 6 is principles-based and the revised Explanatory Material in general provides sufficient details, which serve a baseline to promote a consistent application in the assessments. It is considered suitable for use across various jurisdictions including Hong Kong.*

*The newly added explanatory note of paragraph A24 outlines certain illustrative examples of how accessibility, equity and inclusion could be strengthen from a holistic perspective. To facilitate the stakeholders' understanding and application in their real practice, it is suggested that the explanatory notes to cover a more in-depth elaboration or incorporate illustrated examples to individual principle, particularly to "equity" as certain explanatory notes (i.e. A15 and A16 of the extant IES 6) relevant to this principle have been removed in the revised version.*

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.

**Overall response:** Agree (with no further comments)

**Detailed comments (if any):**

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

**Overall response:** Agree, with comments below

**Detailed comments (if any):**

*With the development of International Standard on Sustainability Assurance (ISSA) 5000 which is anticipated to be finalised in December 2024, member organisations would adopt by localizing those global requirements thereafter at varying paces in different jurisdictions. As such, member organisations or education institutions may take additional time to setup or revise the extant assessment activities to align with the local adoption of ISSA 5000 for the relevant learning outcomes, which support the ultimate goal of an effective implementation of the four new principles of assessment. In light of the above, it is suggested that the release and effective dates of the final ISSA 5000 shall be considered in the course of determining the effective date of the revised IES 6.*

### Part C: Request for General Comments

IFAC is also seeking comments on the matters set out below:

5. General comments are welcomed on all matters addressed in the proposed IES 6 (See Appendices A to F). Where relevant, when making general comments, it is helpful to refer to specific paragraphs, include the reason for the comments and, where appropriate, make specific suggestions for any proposed changes to wording to fully appreciate the respondent's position. Where a respondent agrees with proposals in the exposure draft (especially those calling for a change in current practice), it is helpful to note the reason you agree.

**Overall response:** No response

**Detailed comments (if any):**