



## 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. The 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)	Institute of Singapore Chartered Accountants (ISCA)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Melissa Wu Head, CA Education and Learning
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Judy Chen Associate Director, CA Education and Learning
E-mail address(es) of contact(s)	<a href="mailto:melissa.wu@isca.org.sg">melissa.wu@isca.org.sg</a> <a href="mailto:judy.chen@isca.org.sg">judy.chen@isca.org.sg</a>
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).	<p>The Institute of Singapore Chartered Accountants (ISCA) is the national accountancy body of Singapore. ISCA’s vision is to be a world-class accountancy body of trusted professionals, contributing towards an innovative and sustainable economy. There are over 36,000 ISCA members making their stride in businesses across industries in Singapore and around the world. ISCA members can be found in over 40 countries and members based out of Singapore are supported through 12 overseas chapters in 10 countries.</p> <p>Established in 1963, ISCA is an advocate of the interests of the profession. Complementing its global mindset with Asian insights, ISCA leverages its regional expertise,</p>

knowledge, and networks with diverse stakeholders to contribute towards the advancement of the accountancy profession.

ISCA administers the Singapore CA Qualification and is the Designated Entity to confer the Chartered Accountant of Singapore – CA (Singapore) – designation. ISCA is a member of Chartered Accountants Worldwide, a global family that brings together the members of leading institutes to create a community of over 1.8 million Chartered Accountants and students in more than 190 countries.

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):**

**Paragraphs 2 and 8:** Replacing “appropriate” with “required” provides more clarity on a standard that should be met. This helps ensure that member organizations understand the need to satisfy a defined benchmark, ensuring consistency with standards and accountability in assessing professional competence, i.e. it is not optional but mandatory.

**Paragraph 3:** We agree with the proposed new paragraph that offers a more concise explanation of the assessment process within the IESs, focusing on the required level of competence at the end of IPD, simplifying it for readers to understand the main purpose of IPD without digressing into CPD. It may be beneficial to emphasize clarity in ensuring the level of professional competence is achieved from the necessary learning outcomes, e.g. by way of professional standards documentation to ensure IFAC member organizations and stakeholders have a precise understanding of expectations for aspiring professional accountants. The revised A3 paragraph could read:

*Within the IESs, assessment is the evaluation of professional competence. It involves assessing learning outcomes ~~and ensuring to have confidence~~ that an aspiring professional accountant has demonstrated the required level of professional competence by the end of IPD to perform a role as a professional accountant.*

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):**

**Paragraph A9:** Suggest including some examples of stakeholders other than IFAC member organizations that can provide input, such as educational institutions, professional accountancy organizations, industry regulators, employers, and public sector organizations.

**Paragraph A11:** Suggest the use of the word “**conclusion**” instead of “result” to replace the original word “judgement” as it aligns more closely with the original intent. The revised paragraph could read:

*An assessment activity has a high level of reliability if it consistently produces the same result, given the same set of circumstances. Reliability is not an absolute measure, and different assessment activities may have different levels of reliability. An assessment activity has high reliability if the majority of assessors, acting independently, consistently come to the same ~~judgment result~~ **conclusion**, given the same set of circumstances.*

**Paragraph A12:** Suggest the paragraph be edited to highlight reliability is to be achieved through consistency in results. The revised paragraph could read:

*“There are many ways that assessment activities can be designed and delivered to increase reliability **and produce consistent results**”*

**Paragraph A12 (c):** Suggest the paragraph be edited to highlight reliability is to be achieved through consistency from the use of psychometric modelling. The revised paragraph could read:

*“The reliability of an assessment may be increased by using psychometric modelling **techniques, which ensure consistent and accurate assessment outcomes***

**Paragraph A12 (d):** Suggest the use of the word “qualified” instead of “appropriate” as it aligns more closely with the original intent of the sub-paragraph, which emphasizes the competence and suitability of assessors. The revised paragraph could read:

*“The reliability of an assessment may be increased by selecting ~~appropriate~~ **qualified** assessors, having an assessment rubric or marking guide, and by providing assessor training.”*

**Paragraph A14:** While the proposed addition effectively addresses authenticity in assessment activities, suggest the following be inserted to enhance relevance to assessing professional skills:

*“There are many ways that assessment activities can be designed to increase **the authenticity of assessments of professional skills**. For example:..”*

**Paragraph A15:** Suggest editing the second line to improve clarity:

*“Assessments with high integrity increase confidence **among stakeholders that the completed and submitted assessment reflects the abilities of the aspiring professional accountant.**”*

**Paragraph A18:** Suggest editing the paragraph to improve clarity:

*There are many ways to design assessment activities to increase validity. For example:*

*(a) Validity may be increased when assessing the learning outcomes of aspiring professional accountants to apply a particular accounting standard, by including a comprehensive and relevant case study rather than a simple case study based on incomplete information.*

*(b) Validity may be enhanced when assessing learning outcomes for leadership, ~~through by relying on~~ a workplace assessment of how well an aspiring professional accountant leads a team rather than relying on the outcomes of a written examination.*

(c) Validity can be improved by ensuring that an assessment activity covers ~~more, rather than a few, aspects~~ *of a broader range of aspects within* the particular area of professional competence being evaluated."

**Paragraph A19:** Suggest rephrasing the paragraph with more positive wordings, coherence, and structure to help clarify the explanatory content on transparency among stakeholders regarding the assessment activities. Proposed edits to A19:

*"An assessment activity achieves a high level of transparency when **key** details, such as the **specific** competence areas and learning outcomes ~~to be being~~ assessed, ~~and as well as the~~ timing of the assessments, are publicly disclosed. A high level of transparency is also relevant when considering the entirety of assessment activities conducted during IPD. Transparency is not an absolute measure, and different assessment activities may differ in their levels of transparency.*

*Clear and accessible communications to stakeholders **are crucial and will lead** to achieving a high level of transparency."*

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 comments below](#)

**Detailed comments (if any):**

**Terminology:** The use of terms such as "organizations" instead of "bodies" is a positive change. This modernizes the language and makes it more inclusive and relevant to the current professional environment.

**References to Other IESs:** The addition of references to other International Education Standards (IESs), such as IES 2, 3, and 4, is beneficial. These references provide a more comprehensive framework and context, which helps users understand the interconnectedness of the various standards.

**Feedback Integration:** Incorporating feedback from various stakeholders, including educators, practitioners, and regulatory bodies, could further enhance the revisions. This would ensure that the glossary and amendments are practical and applicable across different regions and contexts.

The revisions are a step in the right direction; implementing these additional suggestions would further improve their effectiveness and usability.

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):

**Training and Development:** Ensuring that educators, trainers, and assessors are fully aware of and trained in the new requirements of IES 6 is crucial. This may involve extensive professional development and training sessions to bridge any knowledge gaps.

**System and Process Adjustments:** Existing systems and processes for evaluating professional competence may need to be overhauled or significantly adjusted. This includes updating technological systems, assessment tools, and reporting mechanisms to comply with the revised standards.

**Continuous Monitoring and Evaluation:** Post-implementation, continuous monitoring and evaluation will be required to assess the effectiveness of the revised standards. This will help in identifying any areas that need further refinement and ensuring ongoing compliance.

### 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:** [See comments below](#)

#### Detailed comments (if any):

The revised IES 6 aims to enhance the quality and relevance of professional accountancy education, its adoption and implementation will require careful planning, resource allocation, and ongoing support to address the anticipated challenges.