

December 15, 2005

Technical Manager
International Accounting Education Standards Board
International Federation of Accountants
545 5th Avenue, 14th Floor
New York, New York 10017 USA

JICPA comments on Proposed International Education Practice Statement, Approaches to Developing and Maintaining Professional Values, Ethics and Attitudes

The Japanese Institute of Certified Public Accountants ("we", "our", "us" or "JICPA") is pleased to comment on the Proposed International Education Practice Statement ("IEPS"), Approaches to Developing and Maintaining Professional Values, Ethics and Attitudes." Based on our review, we have comments on the following three matters that the International Accounting Education Standards Board ("IAESB") is particularly interested in:

1. Section 2 of the proposed IEPS recommends two approaches to implementing the Ethics Education Framework, and suggests that member bodies may choose to follow one approach or mix elements of both. Are both recommended approaches equally helpful in implementing ethics education programs? Do you have any specific (positive or negative) comments on one or both approaches?

We believe that it is preferable for each member body to choose between the "Topic Approach" and the "Stage-by-Stage Approach" which are recommended in this proposed IEPS, whichever suits their own circumstances.

For example, education programs under the Stage-by-Stage approach are to be adopted for students of accounting who are training to become professional accountants and, as appropriate, the Topic Approach is also adopted. For trainees, it would be preferable to adopt the Topic Approach in order to improve their practical skills.

2. The Stage-by-Stage approach recommends that a separate, assessed final course or module in ethics be introduced for students at Stage 3. Do you support such a

recommendation? Please explain.

We believe that the ethics education programs should be integrated in a positive manner and be

mandatory. There is a tendency in Japan for more accounting schools to adopt ethics courses as

a mandatory subject.

3. Section 3 of the proposed IEPS emphasizes the importance of workplace

learning in developing the professional values, ethics and attitudes of

professional accountants both in pre-qualification and post-qualification

education. Do you feel that highlighting the role of workplace learning in this

document is useful? If so, are there other examples of good practice in

workplace learning the IAESB could include in this IEPS?

We consider it useful to highlight the role of practical workplace learning. Practice in ethics

education set out after paragraph 45 seems to include comprehensive examples. Although there may

be other examples, we believe that they are close to those listed after paragraph 45.

Sincerely yours,

Tadahiro ENDO

Executive Board Member - Continuing Professional Education

The Japanese Institute of Certified Public Accountants

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