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Technical Manager

International Accounting Education Standards Board

International Federation of Accountants

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**JICPA comments on the Proposed International Education Practice Statement,
*Practical Experience Requirements –
Initial Professional Development for Professional Accountants***

The Japanese Institute of Certified Public Accountants (“we”, “our”, “us” or “JICPA”) is pleased to provide our comments on the Proposed International Education Practice Statement (“IEPS”), *Practical Experience Requirements – Initial Professional Development for Professional Accountants*. Based on our review, we are submitting comments on three matters about which the International Accounting Education Standards Board (“IAESB”) finds of particular interest:

1. What are respondents’ views on the introduction of the concept of “Initial Professional Development” (IPD)? Is this helpful to member bodies and trainees (and others)? Please explain.

We support the introduction of the concept of “Initial Professional Development” (IPD). We consider this concept useful because it helps IFAC member bodies and trainees regard both pre- and post-qualification stages as an integrated system of professional development. We also would like to suggest that the IAESB specify the need to introduce the concept of IPD and clarify its content.

2. What are respondents’ views on the usefulness of the framework for practical experience (Table 1)? Is the table helpful and complete? Please explain your views.

We believe the establishment of the framework for practical experience is useful. We suggest,

however, the IAESB consider the areas for which the framework may not be suitable. For example, particularly in the area of "Application of Professional Values, Ethics and Attitudes," we believe that the three levels of responsibilities (level 1: gathering information, level 2: analysis and options, and level 3: applying knowledge and skills in a real work environment) illustrated in Table 1 do not stand independently of each other. Rather, we believe the capabilities and competence gained through practical experience in one level could also influence and help improve the capabilities and competence in other levels.

3. The IAESB has tried to develop guidance that can be applied by member bodies across a range of training environments. What are respondents' views on the applicability of the proposed guidance for accountants training in business and/or SMEs/SMPs?

We consider it difficult to require employers of entities such as small and medium-sized entities with limited resources, to provide trainees employed by those entities with relevant practical experience required to qualify as professional accountants. Furthermore, we do not regard it as feasible that the IFAC member bodies be required to provide guidance to trainees employed in such entities.

Other issues

We find the definition of "formal education," which is often referred to in this proposed IEPS including the explanatory memorandum, somewhat unclear. We recommend the IAESB clarify whether this formal education refers to accounting education at universities, education at the pre-qualification stage or professional accounting education programs provided by the IFAC member bodies.

Sincerely yours

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