

Meeting: International Public Sector Accounting
Standards Board

Meeting Location: New York, USA

Meeting Date: March 21–25, 2022

Agenda Item 5

For:

- ☒ Approval
☐ Discussion
☐ Information

MID-PERIOD WORK PROGRAM CONSULTATION

Project summary	The project objective is to perform a limited-scope public review during 2021 on projects to add to the Work Program.	
Task Force members	<ul style="list-style-type: none"> • Ian Carruthers, IPSASB Chair (Task Force Chair) • Todd Beardsworth, IPSASB Member • Lindy Bodewig, IPSASB Member • Luzvi Chatto, IPSASB Member • Lynn Pamment, IPSASB Member • Kamira Sanchez Nicosia, IPSASB Member 	
Meeting objectives	Topic	Agenda Item
Project management	Mid-Period Work Program Consultation: Project Roadmap	5.1.1
	Instructions up to Previous Meeting	5.1.2
	Decisions up to Previous Meeting	5.1.3
Decisions required at this meeting	Major Issues	5.2.1
	Minor Issues	5.2.2
	Consultation Summary	5.2.3
Other supporting items	Supporting Documents 1 – Response Analysis	5.3.1
	Supporting Documents 2 - Analysis of Respondents by Region, Function and Language	5.3.2
	Supporting Documents 3 – [draft] Consultation Summary	5.3.3

**MID-PERIOD WORK PROGRAM CONSULTATION:
PROJECT ROADMAP**

Meeting	Completed Actions or Discussions / Planned Actions or Discussions:
December 2020	1. Overview of Mid-Period Consultation
March 2021	1. Discuss project plan 2. Discuss potential technical projects
June 2021	1. Approve Mid-Period Consultation
September 2021	1. Out for Consultation
December 2021	1. Initial Review of Responses
March 2022	1. Update the Work Program

INSTRUCTIONS UP TO PREVIOUS MEETING

Meeting	Instruction	Actioned
December 2021	1. Develop detailed response analysis for the IPSASB's consideration, including response analysis by region	1. See Agenda Item 5.2.1 and 5.2.2
	2. Develop the Consultation feedback statement for IPSASB approval in March 2022	2. See Agenda Item 5.2.3

DECISIONS UP TO PREVIOUS MEETING

Meeting	Decision	BC Reference
December 2021	1. The feedback statement should be drafted, based on the strong support received from responents, to reflect its tentative agreement to add the two major, and four minor projects proposed in the Consultation to its work program.	1. Not applicable – no standard being issued

Major Projects

Question

1. Does the IPSASB confirm its tentative decision taken in December 2021, that both major projects prioritized in the Mid-Period Work Program Consultation (Consultation) should be added to the work program?

Recommendation

2. Staff recommend the IPSASB confirm its tentative December 2021 decision to add the following two major projects to the work program and for work on them to commence when resources become available:
 - (a) Presentation of financial statements; and
 - (b) Differential reporting.

Background

3. Board and staff resources are expected to become available as current work program projects are completed. This will allow space for the IPSASB to add new projects to its Work Program.
4. In July 2021, the IPSASB sought input to help determine which potential projects would be most important to its constituents in delivering the Strategy and Work Plan 2019-2023 and as a result, should be added to the work program.
5. In seeking stakeholder input, the IPSASB identified projects by applying the project prioritization criteria in the Strategy, and drawing on stakeholder feedback obtained during its development. The IPSASB prioritized six projects for consideration by stakeholders, including two major projects:
 - (a) Presentation of financial statements; and
 - (b) Differential reporting.
6. During its review of the summary analysis in December 2021, the IPSASB tentatively agreed to add both major to its work program, based on the strong support received from respondents.

Analysis

7. The Consultation asked readers to respond to two Specific Matters for Comment (SMC). The first SMC asked whether readers agreed with the major projects proposed by the IPSASB. If not, which projects should be substituted?
8. Respondents strongly supported the projects prioritized:
 - (a) **Comment letters.** 95% of respondents agreed or partially agreed with the proposals; and
 - (b) **Roundtables.** 99% of survey respondents selected one of the major projects as their highest priority (1% indicated they had a different priority).
9. Those respondents that partially agreed supported one, or both, major projects, but suggested IPSASB replace one of the major projects, or add a major project.
 - (a) **Add a major project.** These respondents agreed with the prioritized major projects proposed, but suggested another project could be added. As noted in the Consultation, the IPSASB has limited resources and does not have the ability to take on more than two major projects. Staff

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confirms that this is still the case and the IPSASB does not have the capacity to add another major project.

- (b) **Replace a major project.** These respondents proposed a project to replace one or both of the major projects prioritized in the Consultation. However, as noted in [Agenda Item 5.2.2](#), except for Sustainability, there was a lack of consistency as to what other project should be prioritized (nor is there consistency in what should be removed). Respondents did not provide views that had not been considered by the IPSASB during the development of the Consultation.
10. Therefore, because of the significant support for the two major projects proposed, and the lack of consistency around the limited alternatives suggested, staff propose that the two major projects prioritized in the Consultation should be added to the work program as this best meets the broad public interest priorities of IPSASB's stakeholders.

Decision Required

11. Does the IPSASB agree with the Staff recommendation?

Minor Projects

Question

1. Does the IPSASB agree that three of the minor project prioritized in the Mid-Period Work Program Consultation (Consultation) should be added to the work program, and to add a new Theme C project on sustainability reporting?

Recommendation

2. Staff recommend that the IPSASB add the following minor projects to the work program (to begin when resources become available):
 - (a) IPSAS 21, Impairment of Non-Cash Generating Assets;
 - (b) IPSAS 31, Intangible Assets;
 - (c) IPSAS 33, First Time Adoption of Accrual Basis IPSASs; and
 - (d) Theme C, Sustainability reporting project.

Background

3. Board and staff resources are expected to become available as current work program projects are completed. This allows space for the IPSASB to add new projects to its Work Program.
4. In July 2021, the IPSASB sought input to determine what projects are most important to its constituents in delivering the Strategy and Work Plan 2019-2023 and which as a result should be added to the work program.
5. In seeking stakeholder input, the IPSASB prioritized projects by applying the project prioritization criteria in the Strategy, and drawing on stakeholder feedback obtained during its development. The IPSASB prioritized six projects for consideration by stakeholders, including four minor projects:
 - (a) IPSAS 21, *Impairment of Non-Cash Generating Assets*;
 - (b) IPSAS 31, *Intangible Assets*;
 - (c) IPSAS 33, *First Time Adoption of Accrual Basis IPSASs*;
 - (d) Practice Statement: Making Materiality Judgements.
6. During its review of the summary analysis in December 2021, the IPSASB tentatively agreed to add all of the proposed minor projects to its work program, based on the strong support received from respondents.

Analysis

7. The Consultation asked readers to respond to two Specific Matters for Comment (SMC). The second SMC asked whether readers agreed with the minor projects proposed by the IPSASB. If not, which projects should be substituted?
8. Respondents strongly supported the minor projects prioritized:
 - (a) **Comment letters.** 95% of respondents agreed or partially agreed with the proposals.

- (b) **Roundtables.** All of survey respondents selected one of the minor projects as their highest priority.
9. Those respondents that partially agreed supported one, or more, minor projects, but suggested IPSASB replace one, or more, of the minor projects, or add other minor projects.
- (a) **Add a minor project.** These respondents prioritized the minor projects proposed, but suggested another minor project could be added, instead of one or more of the minor projects. As noted in the Consultation, the IPSASB has limited resources and does not have the ability to take on more than four minor projects, and these minor projects cannot be dropped to make room for another major project.
 - (b) **Replace a minor project.** These respondents proposed one or more projects to replace the minor projects prioritized in the Consultation. However, there was little consistency in the substitute minor projects, except for a sustainability related project. A significant number of constituents noted sustainability as a particularly important public sector topic that needed to be addressed by the IPSASB.

Sustainability Reporting

10. A significant portion of respondents recommended the IPSASB add sustainability reporting to its work program. It is likely an even higher number of constituents would have supported sustainability had the Consultation not explained how the IPSASB is actively engaging in discussions around emerging plans to develop unified international sustainability reporting guidance, in order to evaluate their relevance to public sector financial reporting and how IPSASB could develop future work in this space.
11. The clear and consistent message received from those respondents recommending sustainability reporting is that it is a missed opportunity not to start thinking about this important public interest topic immediately. They further highlighted that the public sector has a responsibility to be transparent about the environmental impacts of its policy decisions, including capturing their financial impact in some way to ensure that government processes and operations are transparent and accountable for their impact on sustainability and the environment. Constituents strongly felt that the IPSASB as the global financial reporting standard setter for the public sector has an important role to play.
12. Sustainability reporting is a broad field, which as yet has only been explored to a very limited extent in the public sector. Moving into this field to any significant extent would be a major expansion of the Board's work. Since the Consultation was published in July 2021, and the comments were submitted by November 30, 2021, the importance of sustainability reporting, and developments internationally, in particular the creation of the International Sustainability Standards Board, have increased the urgency of addressing reporting on sustainability in the public sector space. The strong feedback confirms the IPSASB's views on the need to address the topic through the planned Consultation Paper on Advancing Public Sector Sustainability Reporting.
13. Through ongoing engagement and discussions with several stakeholders, one way for the IPSASB to begin its engagement in the sustainability space is through a narrow-scope project to address the urgent need to explore how financial reporting information could be made more useful for policy formulation and green budgeting. One way suggested through discussions with stakeholders is to develop reporting guidance to help distinguish expenditures that have contributed to sustainability initiatives compared with those that have not. Potentially building on the guidance in RPG 3

(Reporting Service Performance Information) may also help entities in considering whether proposed expenditures would contribute to climate change policies and objectives positively or negatively. Such a project would meet all the IPSASB's project prioritization criteria developed as part of the 2019-2023 Strategy.¹

14. Taken forward in this sort of way, alongside the planned strategic consultation on sustainability reporting, this project would be feasible within existing resources and could help to address a current climate change public sector reporting issue, as well as being achievable in a timely manner. Additionally, the IPSASB's existing RPGs could be enhanced to allow them to be more clearly applicable in the context of a wider sustainability framework.
15. Given the strong recommendations received from many respondents, and the IPSASB's evolving view during private sessions, adding a Theme C² project tied to sustainability reporting is appropriate. Staff therefore, recommend that a research project be added to explore this topic more fully and to develop a project brief that better outlines the objectives of this project and how it might work with other important partners in this space.

Financial Reporting Projects

16. Beyond sustainability reporting, there is no consistency what other project should be prioritized (nor is there consistency in what should be removed). Respondents did not provide views that had not been considered by the IPSASB during the development of the Consultation.
17. However, as noted in the Consultation, the IPSASB only has resources to add four minor projects over the next couple of years. Adding a Theme C project tied to sustainability reporting requires one of the projects prioritized in the consultation to be removed.
18. With no clear direction provided from stakeholders what project could be removed, staff recommend removing Making Materiality Judgements to make room for the sustainability reporting research project. This is the most logical item to remove, as the work on sustainability in the private sector following the creation of the International Sustainability Standards Board, is likely to impact on requirements related to materiality judgements. It therefore makes sense to provide some time for those developments to move forward before developing public sector guidance in order to avoid the possible need to update any guidance rapidly, thus creating confusion for constituents.
19. This longer list of potential projects will be added to those considered in the development of the draft 2024-2028 Strategy and Work Program.

Decision Required

20. Does the IPSASB agree with the Staff recommendations?

¹ Prevalence, consequences, urgency and feasibility are highlighted in the Strategy as criteria for project prioritization.

² Theme C - *Developing Guidance to Meet Users' Broader Financial Reporting Needs*

Consultation Summary

Question

1. Does the IPSASB agree with the approach taken for the Consultation Summary?

Recommendation

2. Staff recommend the Consultation Summary be based on the decisions made by the IPSASB in [Agenda Item 5.2.1](#) and [Agenda Item 5.2.2](#) and the IPSASB delegate the final drafting of the document to the Task Force.

Background

3. The IPSASB decided at the December 2021 meeting that a Consultation Summary should be developed to summarize the IPSASB's response to the Mid-Period Work Program Consultation (Consultation). The purpose was to link the proposals in the Consultation and capture at a high level the IPSASB's consideration of constituent feedback in shaping its decisions related to the additions to the work program.

Analysis

4. Based on the direction received in September 2018, staff has developed a draft of the feedback statement, which is included in Agenda Item 13.3.2 – Consultation Summary.
5. In executing the IPSASB's decision to develop the document, staff has developed the document based on the following considerations:
 - (a) **Based on expected decision.** The Consultation Summary is based on the recommendations proposed by staff in [Agenda Item 5.2.1](#) and [Agenda Item 5.2.2](#). Should the IPSASB disagree with the recommendations, the Consultation Summary will have to be updated.
 - (b) **Professionally design document.** Given the limited time since December to develop the Consultation Summary, the document has not yet been professionally designed. However, the plan is to have one professionally developed consistent with the styling of the 2021 Consultation.
 - (c) **Delegate to Task Force.** Use of a Task Force, if needed, to review the final text. There will be limited time from the end of the March meeting until publication. Edits should be reviewed by the Task Force overseen by the Program and Technical Director with a summary of any significant changes made to the IPSASB Chair.

Decision Required

6. Does the IPSASB agree with the Staff recommendation?

Supporting Documents 1 - Response Analysis

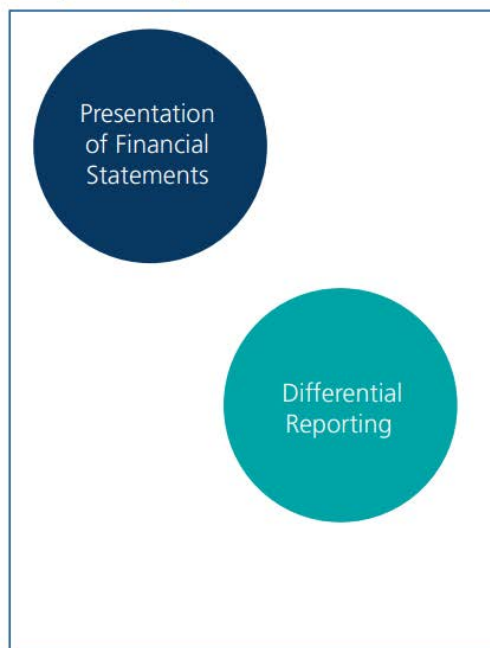
Purpose

1. To provide a detailed analysis of responses to the Mid-Period Work Program Consultation.

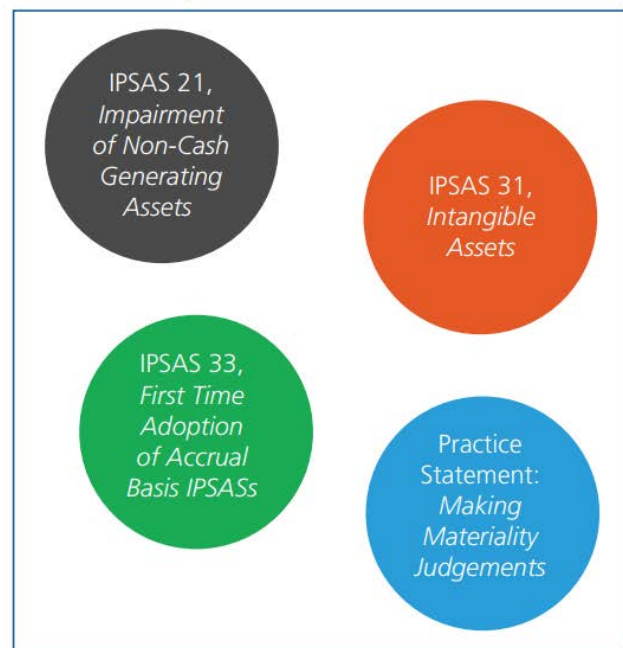
Background

2. As the IPSASB approached the mid-point in its Strategy and Work Plan 2019-2023 (the Strategy), and several its current projects are expected to be completed during 2022 and 2023, Board and staff resources are expected to become available. This allows the IPSASB to add new projects to its Work Program.
3. In July 2021, the IPSASB sought input in determining what projects are most important to its constituents in delivering the Strategy and Work Plan 2019-2023 and as a result, added to the work program.
4. In seeking stakeholder input, the IPSASB prioritized projects by applying the project prioritization criteria in the Strategy, and drawing on stakeholder feedback obtained during its development. The IPSASB prioritized six projects for consideration by stakeholders:

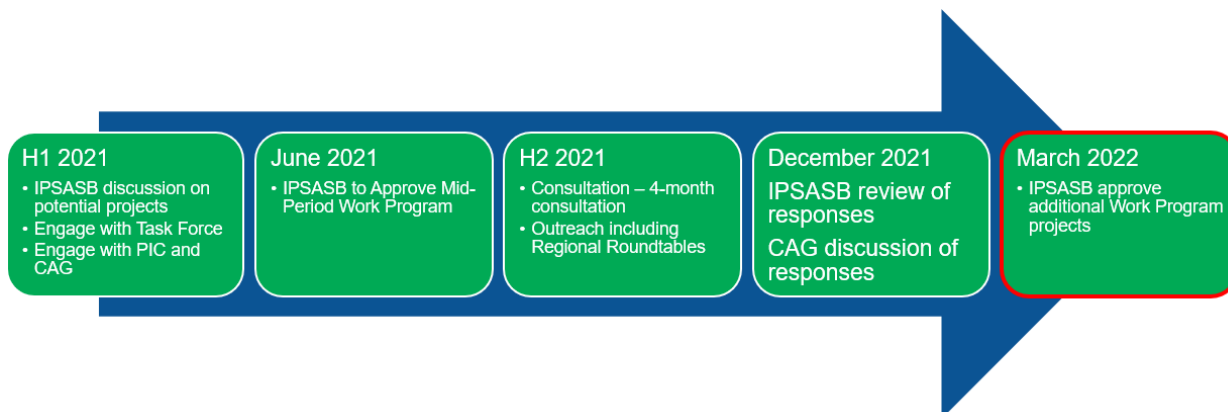
Major Projects



Minor Projects



5. Throughout the entire project, the IPSASB followed is strict due process:



6. To ensure the IPSASB received views from as many constituents as possible, four roundtable events were held in October 2021:

	Africa (Francophone)	Africa	Asia	Latin America
Co-Host	West African Economic and Monetary Union / IFAC	African Union Commission	Asian Development Bank	Governmental Accounting Forum of Latin America (FOCAL)
Date	October 15, 2021	October 19, 2021	October 20, 2021	October 26, 2021
Attendees	117	94	100	96
Countries	26	30	25	20

Analysis

7. The comment period close November 30, 2021. The IPSASB received 19 responses commenting on the two SMCs that were asked:
- Do you agree with the **major** projects proposed by the IPSASB? If not, which major project(s) would you substitute for those proposed, and why?
 - Do you agree with the **minor** projects proposed by the IPSASB? If not, which minor project(s) would you substitute for those proposed, and why?

Major projects

8. Respondents strongly supported the major projects prioritized in the Consultation, with 95% either agreeing or partially agreeing.

Agree	Partially Agree	Disagree	No Comment
11 (58%)	7 (37%)	0 (0%)	1 (5%)

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9. Those respondents that partially agreed supported one, or both, major projects, but suggested IPSASB replace one of the major projects, or add a major project. See paragraph 14 below.
10. Participants at the October roundtables were asked with two major project do you feel is most important to address in your jurisdiction. Similarly, support was extremely strong for the projects proposed:

Presentation of financial statements	Differential Reporting	Other
83% of participants	16% of participants	1% of participants

Minor projects

11. Respondents strongly supported the minor projects prioritized in the Consultation, with 95% either agreeing or partially agreeing.

Agree	Partially Agree	Disagree	No Comment
12 (63%)	6 (32%)	0 (0%)	1 (5%)

12. Those respondents that partially agreed supported one, or more, minor projects, but suggested IPSASB replace one, or more, of the minor projects, or add minor projects outright. See paragraph 14 below.
13. Participants at the October roundtables were asked with two major project do you feel is most important to address in your jurisdiction. Similarly, support was extremely strong for the projects proposed:

IPSAS 33	Materiality	IPSAS 21	IPSAS 31	Other
68% of participants	14% of participants	13% of participants	5% of participants	0% of participants

Other projects proposed

14. Other projects suggested by respondents include:

Project	Percentage of Respondents proposing project
Sustainability Reporting	42%
Related party disclosure	16%
Tax expenditure	16%
Discount rates	11%
Conceptual Framework review	11%
Interpretations group	11%

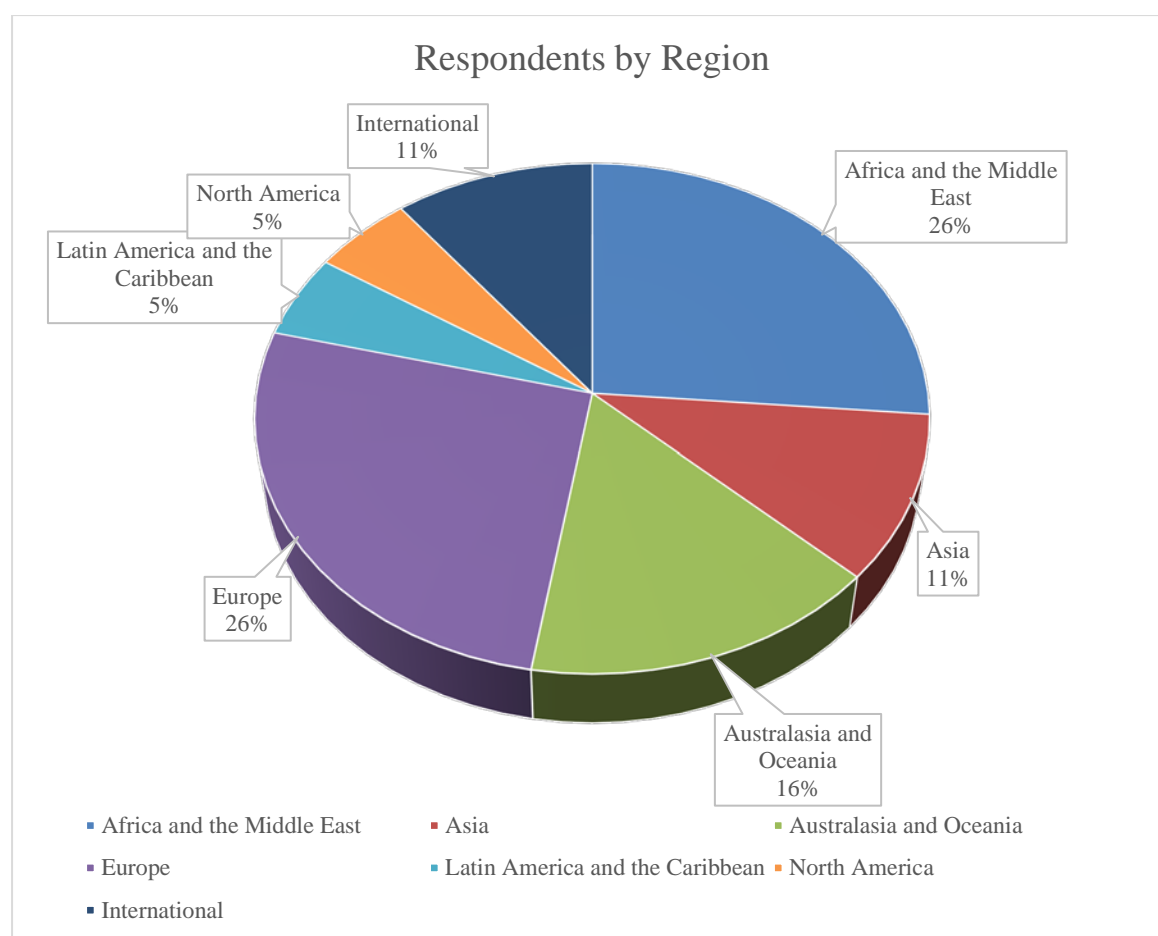
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Provisions and contingent liabilities (IPSAS 19)	5%
Service concession arrangements	5%
Indigenous rights	5%
Combinations where the relationship is not directly based on control	5%

Supporting Documents 2 – Analysis of Respondents by Region, Function and Language

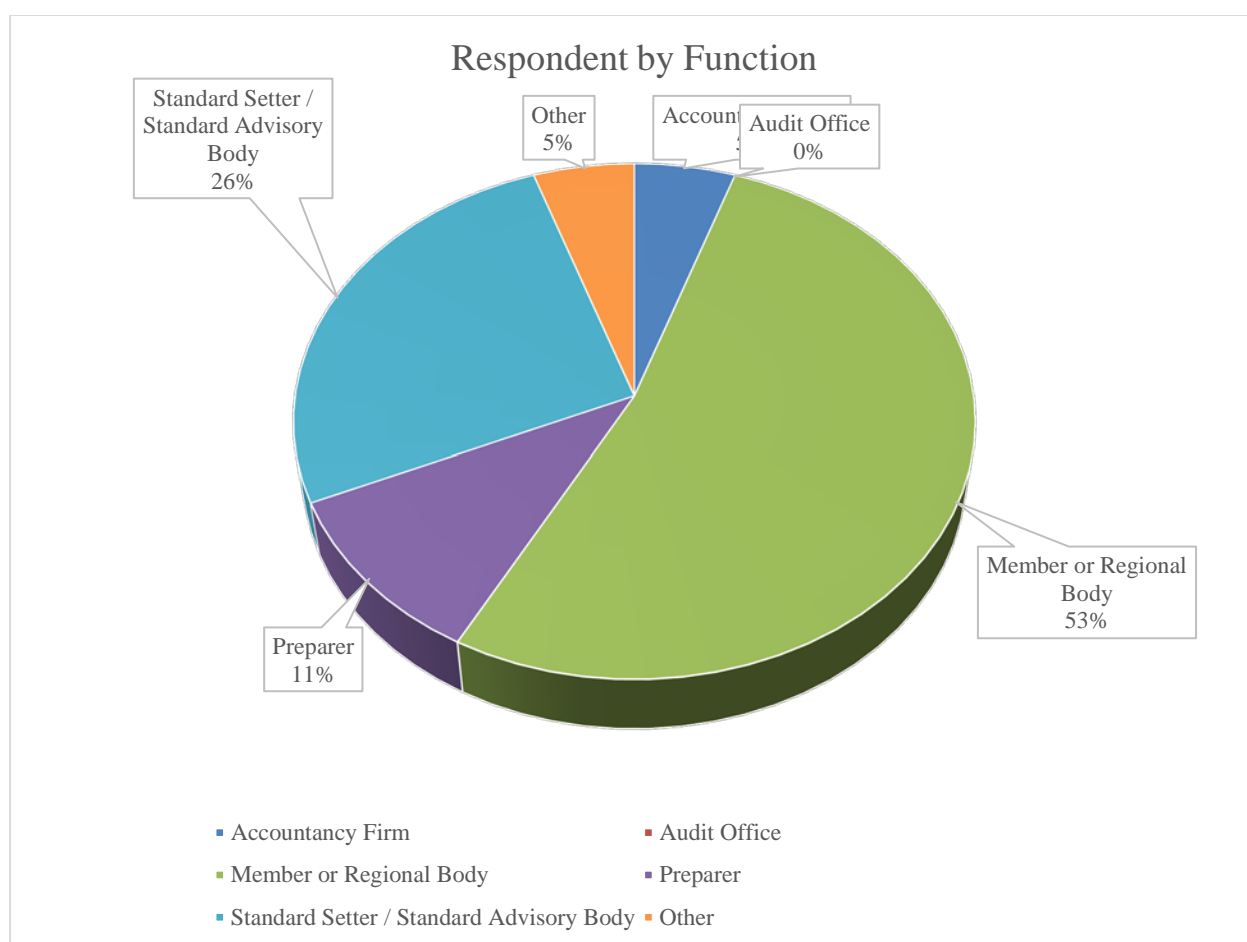
Geographic Breakdown

Region	Comment letter(s)	Total Respondents
Africa and the Middle East	02, 09, 14, 15, 16	5
Asia	07, 10	2
Australasia and Oceania	04, 05, 08	3
Europe	03, 11, 13, 18, 19	5
Latin America and the Caribbean	06	1
North America	17	1
International	01, 12	2
Total		19



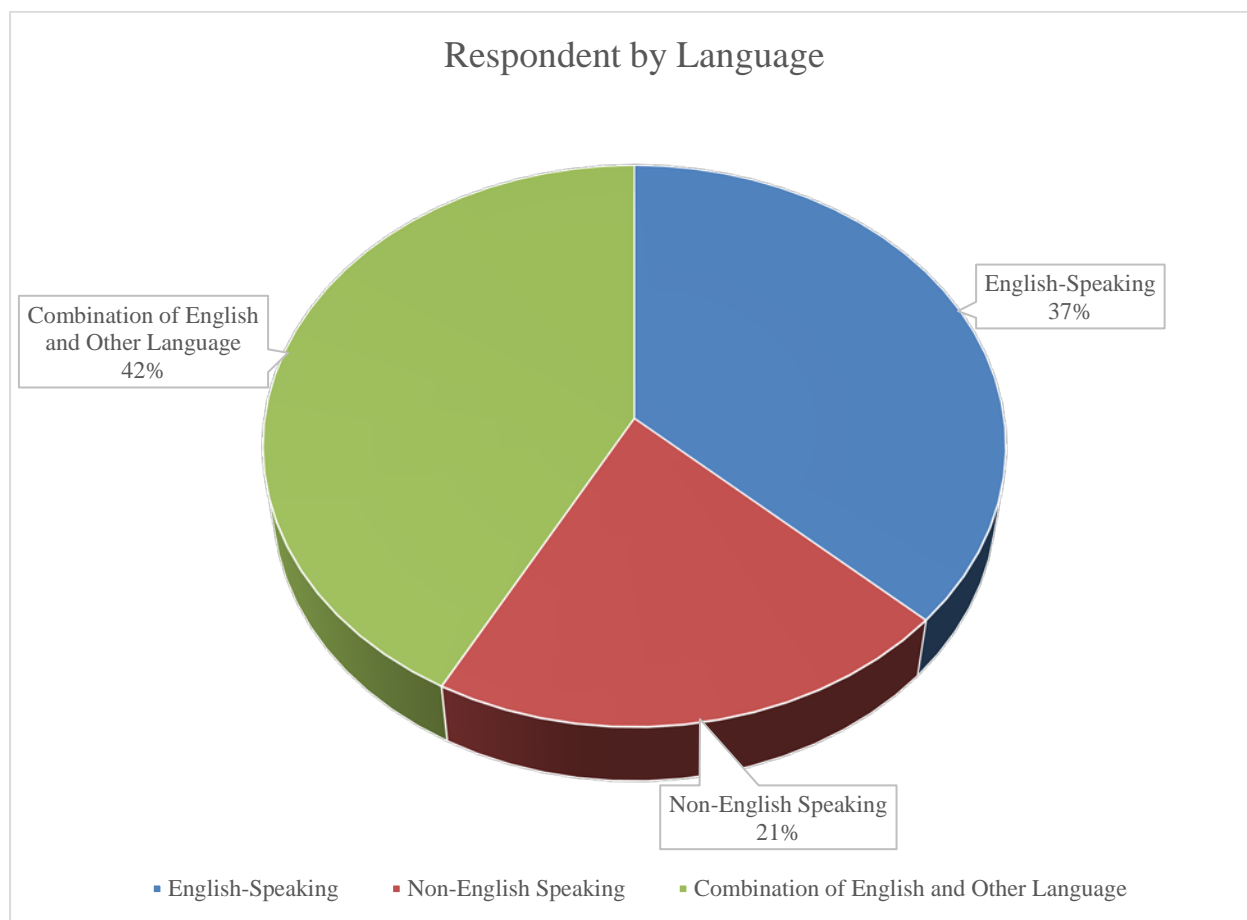
Functional Breakdown

Function	Comment letter(s)	Total Respondents
Accountancy Firm	12	1
Audit Office	-	0
Member or Regional Body	05, 06, 07, 09, 10, 11, 13, 14, 15, 16	10
Preparer	01, 08	2
Standard Setter / Standard Advisory Body	02, 03, 04, 17, 19	5
Other	18	1
Total		71



Linguistic Breakdown

Language	Comment letter(s)	Total Respondents
English-Speaking	01, 02, 04, 05, 08, 13, 15	7
Non-English Speaking	03, 06, 07, 19	4
Combination of English and Other Language	09, 10, 11, 12, 14, 16, 17, 18	8
Total		19



Appendix B: List of Respondents

Comment Letter #	Respondent	Country	Function
01	Mouna Churbaji	International	Preparer
02	ASB	South Africa	Standard Setter / Standard Advisory Body
03	SRS	Switzerland	Standard Setter / Standard Advisory Body
04	XRB	New Zealand	Standard Setter / Standard Advisory Body
05	Chartered Accountants Australia and New Zealand	Australia	Member or Regional Body
06	CFC	Brazil	Member or Regional Body
07	JICPA	Japan	Member or Regional Body
08	HoTARAC	Australia	Preparer
09	ACCA and PAFA	International	Member or Regional Body
10	ICAI	India	Member or Regional Body
11	Accountancy Europe	International	Member or Regional Body
12	E&Y	International	Accountancy Firm
13	ICAEW	United Kingdom	Member or Regional Body
14	ICAN	Nigeria	Member or Regional Body
15	BICA	Botswana	Member or Regional Body
16	ICPAK	Kenya	Member or Regional Body
17	PSAB Canada	Canada	Standard Setter / Standard Advisory Body
18	CIGAR	International	Other
19	CNOCP	France	Standard Setter / Standard Advisory Body

Supporting Documents 3 – [draft] Consultation Summary



Strategy and Work Program 2019-2023

Mid-Period Work Program Consultation Summary

April 2022

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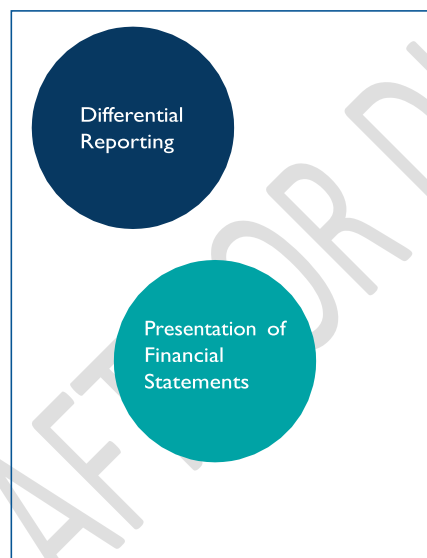
Consultation Process

In its [Strategy and Work Plan 2019-2023 \(the Strategy\)](#), the IPSASB committed to hold a public consultation mid-way through the Strategy period on the next projects that could be added to the [Work Program](#) during the remainder of the Strategy period, as current projects are completed.

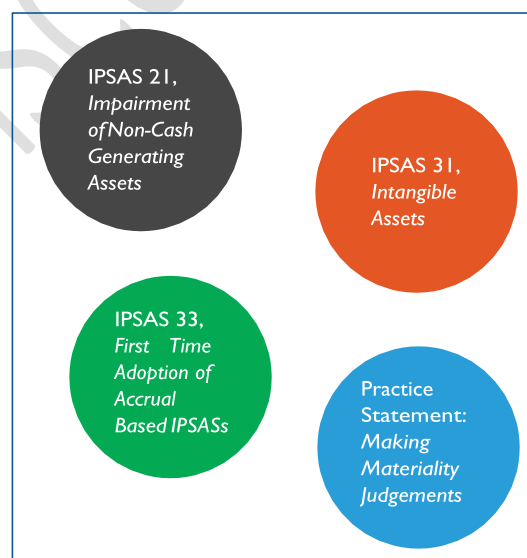
Proposed Projects

The Consultation proposed adding the following projects to the IPSASB Work Program:

Major Projects



Minor Projects



Work on these proposed projects would begin when resources become available.

Process Followed

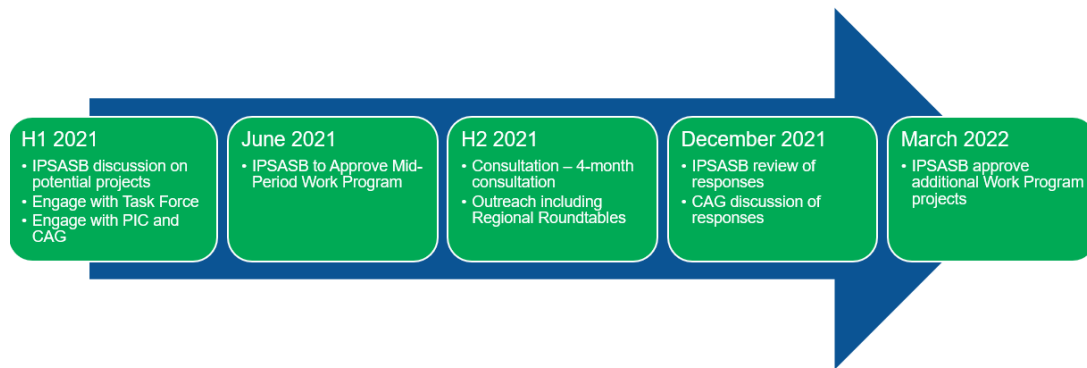
The IPSASB adopted an open and inclusive process when prioritizing

projects to be added to its Work Program. This included discussions and dialogue with different stakeholder groups including:

(a) The IPSASB Consultative Advisory Group and the Public Interest Committee; and

(b) Jurisdictions using IPSAS or in the process of adopting and implementing IPSAS.

The IPSASB published the Consultation in July 2021, with comments accepted until the end of November 2021. The Consultation requested comments on the two major projects proposed and the four minor projects proposed.



Direct Feedback

The IPSASB held four virtual roundtables in October 2021 to receive direct feedback on the proposals in the Consultation. The Board worked with partners to organize and host the roundtables to ensure broad engagement with constituents across each region. The IPSASB extends formal thanks to each regional partner for their efforts in helping to organize, host and ensure that constituents could attend the roundtables.

Project Prioritization

Feedback Received from Constituents

Support for the proposed projects was very strong overall, from both the roundtables and the comment letters.

Regional Roundtable Analysis

The four regional round table events attracted 407 attendees from over 75 countries. The regional roundtable details and key statistics are noted below:

	Africa (Francophone)	Africa	Asia	Latin America
Co-Host	West African Economic and Monetary Union / IFAC	African Union Commission	Asian Development Bank	Governmental Accounting Forum of Latin America (FOCAL)
Date	October 15, 2021	October 19, 2021	October 20, 2021	October 26, 2021
Attendees	117	94	100	96
Countries	26	30	25	20

The use of direct in person roundtables was intended to allow the IPSASB to increase the feedback received and broaden the group of those engaging in its work. The direct feedback received on the Consultation from this large and broad group of constituents has made a significant contribution to ensuring the legitimacy of the projects the IPSASB has added to its Work Program given the strong support of the proposals.

Roundtable participants were asked two questions:

Question 1: Which major project is the most important in your jurisdiction?

Presentation of financial statements	Differential Reporting	Other
83% of participants	16% of participants	1% of participants

Question 2: Which minor project is the most important in your jurisdiction?

IPSAS 33	Materiality	IPSAS 21	IPSAS 31	Other
68% of participants	14% of participants	13% of participants	5% of participants	0% of participants

Comment Letters

In response to this Consultation, the IPSASB received 19 responses. Respondents strongly supported the major projects prioritized in the Consultation, with 95% either agreeing or partially agreeing.

Agree	Partially Agree	Disagree	No Comment
11 (58%)	7 (37%)	0 (0%)	1 (5%)

Similarly, respondents support was strong for the minor projects prioritized, with 95% either agreeing or partially agreeing.

Agree	Partially Agree	Disagree	No Comment
12 (63%)	6 (32%)	0 (0%)	1 (5%)

Those respondents that partially agreed supported most proposals, but suggested the IPSASB replace or add one or more projects. See Feedback Received from Constituents below.

For a complete list of respondents, see [Appendix A](#).

In addition to the projects proposed, many respondents suggested further projects that should be included in the IPSASB Work Program. Except for adding a sustainability-related project, there was little consistency between responses for which further project should be added. This longer list of potential projects will be added to those considered in the development of the 2024-2028 Strategy and Work Program.

Sustainability Reporting

Since the Consultation was published in July 2021, the importance of sustainability reporting, and developments internationally, in particular the creation of the International Sustainability Standards Board, have increased the urgency of addressing reporting on sustainability in the public sector space. However, sustainability reporting is a broad field, which as yet has only been explored to a very limited extent in the public sector. Moving into this field to any significant extent would be a major expansion of the Board's work.

Through ongoing engagement and discussions with several stakeholders, one way identified for the IPSASB to move forward in the short term would be through a narrow-scope project to address the urgent need to explore how financial reporting information could be made more useful for policy formulation and green budgeting decisions. Potentially building on the guidance in [RPG 3 - Reporting Service Performance Information](#), could help entities in considering whether proposed expenditures would contribute to climate change policies and objectives positively or negatively. Such a project would meet all the IPSASB's project prioritization criteria

developed as part of the 2019-2023 Strategy.¹

Taken forward in this sort of way, alongside the [proposed] broader public sector sustainability reporting consultation [LINK], this project would be feasible within existing resources and could help to address an urgent public sector reporting issue, as well as being achievable in a timely manner.

Financial Reporting Work Program

The IPSASB remains fully committed to delivering on its existing financial reporting Work Program. In order to add a sustainability-related financial reporting project within its existing resources, the Board has decided to deprioritize one of the minor projects proposed in the Work Program Consultation.

The Board has decided to defer the proposed project on Making Materiality Judgements as this is a topic that is being reconsidered in the broader context of sustainability reporting, making it preferable to await greater certainty in this area before proceeding.

IPSASB Approved Projects Added to the Work Program

The major projects added to the IPASB Work Program are:

- (a) Presentation of financial statements; and
- (b) Differential reporting.

The major projects added to the IPASB Work Program are:

- (a) IPSAS 21, *Impairment of Non-Cash Generating Assets*;
- (b) IPSAS 31, *Intangible Assets*;
- (c) IPSAS 33, *First Time Adoption of Accrual Basis IPSASs*; and
- (d) IPSASB Strategic Theme C Project: *Reporting Sustainability Program Information*.

¹ Prevalence, consequences, urgency and feasibility are highlighted in the Strategy as criteria for project prioritization.

Appendix A – List of Comment Letter Respondents

Mouna Churbaji

Staff of the Accounting Standards Board (SA)

Schweizerisches Rechnungslegungsgremium für den öffentlichen Sektor (SRS)

New Zealand Accounting Standards Board (NZASB) of the External Reporting Board (XRB)

Chartered Accountants Australia and New Zealand

Conselho Federal de Contabilidade (CFC)

Japanese Institute of Certified Public Accountants (JICPA)

Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC)

Association of Chartered Certified Accountants (ACCA) and Pan African Federation of Accountants (PAFA)

Institute of Chartered Accountants of India (ICAI)

Accountancy Europe

Ernst & Young GmbH

Institute of Chartered Accountants in England and Wales (ICAEW)

Institute of Chartered Accountants of Nigeria (ICAN)

Botswana Institute of Chartered Accountants (BICA)

Institute of Certified Public Accountants of Kenya (ICPACK)

Staff of the Public Sector Accounting Board (Canada)

Task Force IRSPM A&A SIG, CIGAR Network, EGPA PSG XII

Conseil de Normalisation des Comptes Publics (CNoCP)

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