



INTERNATIONAL FINANCIAL REPORTING FOR NON PROFIT ORGANISATIONS

International Non-profit Accounting Guidance (INPAG) Exposure Draft 3

Response template

Please use this form to record your responses to the Specific Matters for Comment relating to [INPAG Exposure Draft 3](#)

Comments are most helpful if they:

- a) Address the question asked;
- b) Contain a clear explanation to support the response provided, whether this is agreeing or otherwise with any proposals made;
- c) Propose alternatives for consideration, where responses are not in agreement with the proposal made;
- d) Specify the INPAG paragraphs to which any comments relate; and
- e) Identify any wording in the proposals that might not be clear because of how they translate.

The text boxes will expand as required. There is no size limit. There are 11 question areas, according to the various sections in INPAG. You do not need to answer all questions and can choose to answer as many or as few as you wish. You may comment on any aspect of Exposure Draft, not just the specific matters identified. General comments should be added at the end of this document.

Responses must be received by **16 September 2024 and must be in English.**

Responses can be submitted to ifr4npo@cipfa.org or through the website at www.ifr4npo.org/have-your-say

Respondent information:

First name:	Catherine	Country:	Kenya
Last name:	Asemeit	Professional interest: please choose from: <ul style="list-style-type: none"> • NPO, ie preparer of financial statements, • auditor, • accounting standard setter, • professional accounting organisation, • regulator of NPOs, • donor, • academic, • civil society, • user of NPO services, • other (please state) 	Professional Accounting Organisation
Email:	Catherine.asemeit@icpak.com		
Position:	Director, Standards & Technical Services		
Organisation:	Institute of Certified Public Accountants of Kenya (ICPAK)		
Response submitted	on behalf of my organisation		
Please indicate whether you wish to receive further information about this project and consent to being contacted at the email address provided.			Agree

This document has been designed purely to enable feedback to Exposure Draft 3. Participation is undertaken on a voluntary basis. The responses will be used to shape the development of INPAG and not for any other purpose. We ask for your name and contact information to enable us to contact you if we should have any clarifications regarding your responses. Responses will be public, but personal contact information will not be disclosed. Personal information will only be held for the purposes of developing INPAG. You may withdraw your consent for us to hold any of your personal information at any time by contacting us at ifr4npo@cipfa.org.

Specific Matters for Comment

Question 1: Fund accounting

INPAG Section 36 sets out the characteristics of a fund for the purposes of INPAG and whether a fund is presented in the financial statements as being with or without restrictions. A fund is presented as with restrictions where the use of resources is limited to a specific purpose or activity as a consequence of externally imposed legal or equivalent arrangements or where a fund is established for a fundraising campaign with an externally communicated commitment on the specific use for the funds. The guidance requires that the income, expenses, assets and liabilities associated with a fund are recorded. New disclosures are required for fund balances and movements in the year. INPAG Section 5 has been amended to remove the requirement to disclose funds with and without restrictions on the face of the Statement of Income and Expenses.

1 Fund accounting	References	Response
a) Do you agree that the ED1 requirement to present funds with restrictions and funds without restrictions on the face of the Statement of Income and Expenses should be removed? If not, why not?	G5.3, AG5.4	<p>We do not agree with the proposed changes. The single column may not reflect fair presentation of the results of the NPO e.g. The operating deficit as per the illustrative statement of income and expenses is CU 000 (53) which is a result of surplus of is CU 000 234 that relates to restricted funds and an operation deficit of CU 000 286. This does not give the correct results of the organization. We propose that as minimum we maintain 2 columns 1 Conditional grants (EFG and OFA)-restricted and the other for unconditional grants (unrestricted) so that the user of the financial statement is able to see the results of the NPO. The statement of income expenditure could present misleading information from year to year on utilization of conditional grants.</p> <p>Additional guidance should be given where an organization funding part of the restricted funds, for example in the movement of funds on the pandemic funding it shows a deficit of CU 000 26, what is not clear is whether this due from donor through on an enforceable grant arrangement asset or this has been funded by the organization hence need to be transferred to the general fund. We need a clear guidance on such arrangement where a program is partly funded by own resources but is also expecting reimbursement.</p>
b) Do you agree that the guidance in Section 36 will ensure that material funds can be identified? If not, what changes would you propose? Is there a risk that funds are not identified?	G36.3–G36.4, Figure AG36.1	<p>We agree with the guidance as provided. It identifies the core fund as the general fund and the other created through internal requirements, legal, enforceable by grantor or donor. We also agree with definition of a separate fund as created by: -</p> <ul style="list-style-type: none"> • Legal or equivalent to track resources and the use of fund • Reasonable expectations that the resource will be used for specific set of activities
c) Do you agree that income, expenses, assets and liabilities are tracked for each fund? What are the costs and benefits? What, if anything, would you change and why? What are the practical considerations?	G36.5, G36.7, AG36.3	<p>We agree that income and expense be tracked separately so that you are able to understand the results of the year. For property and equipment, we propose that a disclosure would be adequate.</p>

1 Fund accounting	References	Response
		<p>For other assets and liability, we proposed that only enforceable grant arrangement asset and liability which should be shown separately on the face of statement of financial position. All the other assets and liability tracking should not be mandatory except for cash and cash equivalent, which needs to be restricted on the cash flow statement.</p>
<p>d) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?</p>	<p>G36.21–G36.23</p>	<p>Yes, however for the disclosure to have a complete picture of the fund you should consider combining part of note 5 of illustrative notes,</p> <ul style="list-style-type: none"> • Column showing Receipts, refunds, enforceable grant arrangement asset • Release of unrestricted funds e.g. NICRA • Transfer to enforceable grant arrangement liability
<p>e) Do you agree with the two criteria for a fund to be a fund with restrictions? If not, what would you change and why?</p>	<p>G36.9</p>	<p>Yes, we agree with the two criteria- a) used of resources limited to activity b) communication publicly to be used for specific purpose</p>
<p>f) In order to provide transparency about the finances of an individual fund, do you agree that all the expenses should be charged against a fund with restrictions even if there are currently insufficient resources to cover these, or specific costs are not eligible under a grant arrangement? If not, what alternative would you propose and why?</p>	<p>G36.11–G36.12</p>	<p>No, we do not agree that legitimate expenses be charged to the fund. We propose that the same be accounted through enforceable grant arrangement asset, which will be subsequently be tested for impairment.</p> <p>Having a negative fund does not present the fair view of the fund. If the organization is working a reimbursable basis, then the reimbursable cost should be recognized as enforceable grant arrangement asset where the grant income is recognised to the extent that it is receivable. It is our view that the only negative fund should be the general fund.</p>
<p>g) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?</p>	<p>G36.21–G36.23</p>	<p>Yes however for the disclosure to have a complete picture of the fund you should consider combining part of note 5 of illustrative notes,</p> <ul style="list-style-type: none"> • Column showing Receipts, refunds, enforceable grant arrangement asset • Release of unrestricted funds e.g. NICRA • Transfer to enforceable grant arrangement liability
<p>h) Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?</p>	<p>Implementation Guidance – Section 36</p>	<p>The illustrative examples largely illustrate the key concepts in fund accounting. However, as an alternative that should considered is accounting for grants given for capital assets, which should be recognized directly fund on initial recognition and released to statement of income and expenditure over the useful as opposed to flowing through statement of income and expenses. Similar to section 24 Accounting for Government Grants.</p>

Question 2: Presentation of expenses, fundraising costs and related disclosures

INPAG Section 24 Part II provides guidance on the presentation of expenses. It permits an expense analysis by nature, by function, or a mixture of the two. It includes a rebuttable presumption that an analysis by nature is used unless another analysis provides information that is more relevant and reliable. Guidance is provided on the allocation and aggregation of costs where a functional or mixed presentation is used, which will be useful for calculating support costs. INPAG Section 24 Part III provides a definition of fundraising activities and identifies three categories to be disclosed: activities to generate donations, gifts and similar transfers; commercial and trading activities; and investment management. There is a pragmatic exception where costs need to be split between fundraising and other activities.

INPAG Section 33 on related party disclosures draws attention to the possibility that an NPO's financial position and/or its surplus or deficit have been affected by the existence of related parties. Disclosure is required of personnel compensation made to governing body members as well as key management personnel. INPAG Section 28 has been updated to include the disclosure of short-term employee related benefits.

2 Presentation of expenses	References	Response
a) Do you agree that there is a rebuttable presumption that a by nature classification of expenses is used unless this doesn't provide the most relevant and reliable information to the users of the financial statements? If not, why not?	G24.43–G24.47, AG24.45–AG24.47	We do not agree with the rebuttable assumption. NPO are quite diverse and one classification may not be suitable to another. In our view, classification by function may be more relevant for NPO as opposed by nature, as most NPO operations are activity based. In our opinion to achieve fair presentation, a mixed presentation would be ideal including both by function and by nature.
b) Do you agree that the rationale for using a classification of expenses other than by nature should be disclosed? If not, why not?	G24.44	We do not agree as the key objectives of most NPO are driven by activity as opposed to nature. The opposite is true, as most user of financial would find a mixture of the two critical. The most common presentation is where you have administration costs and program costs.
c) Do you agree that where a functional or mixed presentation of expenses is used, a narrative description of the types of expenses incurred on each function line item is sufficient and that a requirement for these to be quantified is not necessary? If not, why not?	G24.46, AG24.48	We do not agree. Quantification of expense by function would give a fair reflection of the entity's activities and whether it is meeting its objective. NPO operations and objectives are mainly driven by activity hence mounts spent on activities would give fair presentation the stakeholders.
d) Do you agree with the expense disclosure requirements? If not, what would you change and why?	G33.7–G33.11	We agree with expense disclosure for Key management & Governing body. We however propose that G.33 10 (d) be deleted, as it can be pre-judicial to the preparer of the accounts. We propose that judgement on the impact of non-compliance with the constitution or law be left to the preparer and the auditor. ((d) confirmation that the NPO is allowed to make such payments under law /constitution.)
e) Do you agree with the description of direct costs, shared costs and support costs and that these allow the full cost of an activity to be identified? If not, why not?	G24.48–G24.49	We do not agree with the requirement of this section. In our opinion this two section should be omitted. The basis of allocation and aggregation varies significantly from donor to donor and the structure of the agreements even within the same donor. This disclosure may become onerous especially where NPO are running several programmed with different donors.

2 Presentation of expenses	References	Response
		The guidance that should focus on accounting for internal recharge to project such as NICRA, which will appear in project activities as both income and expense. In general, purpose financial statement this are normally reversed.
f) Do you agree that commercial and trading activities that are for the purposes of fundraising and investment management costs associated with a fund whose purpose is to generate future returns are included as fundraising activities? If not, why not?	G24.64–G24.66	Yes, however there needs to clarity on the nature of costs. Our view is that you should consider having primarily pre-operating costs and research & development costs as fundraising costs. Once operation commences this are normal business costs
g) Do you agree with the pragmatic exception that fundraising costs do not need to be split from other costs where the cost of doing so would exceed the information benefit to stakeholders? If not, what would you change and why?	G24.72	Yes. We agree with the exception
h) Do you agree that the costs for each of the three categories of fundraising activity should be separately disclosed and presented gross? If not, what should be disclosed and why?	G24.74	Yes, we agree. It is our view that fundraising cost be disclosed gross.
i) Do you agree that grants or donations made in arm’s-length transactions with governing body members and any services they receive on the same terms as other eligible service recipients need not be disclosed as a related party transaction? If not, why not?	G33.18 a)–G33.18 b)	No we don’t agree. All related party transactions whether at arms length or not should be disclosed in the financial statements. A governing body member is a key management who has access to information that may not be available to 3 rd party hence rarely are this transaction purely at arms length. I believe that should there be an exception it will be inconsistent reporting across the entities. The standards need to focus on the definition of who is a related party. Once that is established then all transaction should be disclosed.

Question 3: Supplementary information and INPAG Practice Guide 1 – Supplementary statements

INPAG Section 37 requires additional information to be disclosed when an NPO produces one or more supplementary statements using INPAG Practice Guide 1. NPOs may choose to prepare a single note to meet the requirements or disclose only the additional information. INPAG Practice Guide 1 – Supplementary Statements enables the presentation of key financial information about a specified activity, project or grant, in a prescribed statement format, which can be included as an Annex to the financial statements. The Practice Guide provides templates for different variants of reporting that includes comparison to budget, multiple grants, multiple time periods and different currencies.

3 INPAG Practice Guide 1	References	Response
a) Do you agree that the requirements of Section 37 do not have to be met unless Supplementary statements are prepared in accordance with INPAG Practice Guide 1– Supplementary statements? If not, why not?	G37.1–G37.2	Yes. There would be no need for compliance if no supplementary information is provided.
b) Do you agree that a whole of NPO supplementary statement need not be presented if the additional information is already in the financial statements and/or notes? If not, why not?	G37.3, G37.10–G37.12	Yes. This will avoid duplication.
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	Yes. However, entities should be allowed to include additional line items depending on nature of entity and information they intend to present.
d) Do you agree with the options for the disclosure of capital and inventory related costs? If not, what would you change and why?	SS.18–SS.21	Yes. It gives the NPOs flexibility to apply the options to their specific circumstances.
e) Do you agree that the Supplementary statements are not part of the general purpose financial report but can be published as an annex? If not, why not?	SS.25–SS.26	Yes. Some of the information presented in the supplementary statements may not be prepared in accordance with INPAG but entity-specific or donor requirements.

Question 4: Illustrative financial statements

INPAG Implementation Guidance Annex A includes Illustrative financial statements. The templates have been populated with data to cover the most common NPO transactions. The illustrative financial statements focus on new INPAG requirements.

4 Illustrative financial statements	References	Response
a) Do you agree that the illustrative financial statements cover the transactions that are prevalent for NPOs? If not, which prevalent transactions are missing and why do these need to be covered?	Illustrative financial statements	<p>Except for the comments included in some of our comments, the illustrative financial statements in general cover the transactions that are prevalent for NPOs. Some of the areas include</p> <ul style="list-style-type: none"> • Proposed changes on to changes ED1 requirement to present funds with restrictions and funds without restrictions on the face of the Statement of Income and Expenses – we propose this be retained • Rebuttable classification by nature

Question 5: Equity

INPAG Section 2 provides the concepts and principles on which INPAG is based. Amendments are proposed to equity and net assets as a result of feedback. Net assets is a new element defined as the residual amount of an NPO's assets and liabilities available to achieve its objectives. The term equity claim is introduced to describe equity type instruments, which is a subset of net assets. INPAG Section 22 has the principles for classifying financial instruments as either liabilities or equity claims. As INPAG does not use the term equity, consequential amendments reflect the expected nature of NPO equity claims.

5 Equity	References	Response
a) Do you agree with the revised description of net assets and its inclusion as an element? If not, what would you change and why?	G2.73	We agree with the revised specific description of net assets as are the residual of recognised assets minus recognised liabilities available to the NPO to achieve its objectives.
b) Do you agree with the use of the term equity claims in Sections 2 and 22 and that equity claims are a subset of net assets? If not, what would you change and why?	G2.74, AG2.6, AG2.7, Section 22	We agree with equity claims being a subset of net assets and the definition where a holder has financial interest in the net assets of an NPO.
c) Do you agree that the paragraphs relating to the sale of options, rights and warrants, extinguishing financial liabilities with equity claim instruments and treasury shares are removed from and that the paragraphs relating to capitalisation or bonus issues of shares and share splits and convertible debt or similar compound financial instruments are retained? If not, why not?	G22.12–G22.15	We agree the paragraphs relating to the sale of options, rights and warrants, extinguishing financial liabilities with equity claim instruments and treasury shares be removed due to the nature of NPOs and that the paragraphs relating to capitalization or bonus issues of shares and share splits and convertible debt or similar compound financial instruments are retained on the circumstance that an NPO has control of, acquires or merges with another entity that has share capital. Furthermore, it is very rare for NPO to have such instruments.

Question 6: Transition to INPAG

INPAG Section 38 describes the requirements for recognising and measuring assets and liabilities to create a Statement of Financial Position when INPAG is adopted for the first time. Accumulated funds that contain historic surpluses and deficits must be split between funds with restrictions and funds without restrictions. Compliance with just the financial statements can be asserted ahead of full compliance. The narrative reporting requirements must be completed within a two-year period to be able to continue to express compliance with INPAG.

6 Transition to INPAG	References	Response
a) Do you agree with the pragmatic approaches proposed for the first time adoption of INPAG? If not, what are the practical challenges that are likely to be experienced?	G38.11–G38.12	Yes, we agree with the pragmatic approaches proposed for the first time adoption of INPAG so as not to diminish the comparative information available and reduce barriers to adoption.
b) Do you agree that compliance with INPAG can be expressed in relation to the financial statements only for a two-year transitional period? If not, why not?	G38.5–G38.6	We agree compliance with INPAG can be expressed in relation to the financial statements only for a two-year transitional period.

Question 7: Application of fair value

INPAG Section 12 describes how to measure assets and liabilities using fair value. The use of fair value to determine the deemed cost of donated assets is reflected in INPAG Section 16, for investments in land or buildings that are held to earn rentals or for their capital appreciation, INPAG Section 17, for property, plant and equipment, including capitalisation and depreciation and INPAG Section 18, for identifiable non-monetary assets that does not have a physical substance (e.g. licenses). The cost model in Section 17 applies to all tangible assets that are held for use in the activities of the NPO and are expected to be used during more than one period as well as to property held to deliver an NPO's missional objectives, e.g. social housing. There are no exceptions for assets that are funded by grants or donations.

7 Application of fair value	References	Responses
a) Is the Section 12 application guidance that sets out how the fair value hierarchy applies to NPO assets and liabilities and the illustrative examples of fair valuing donations in-kind useful? If not, how could it be improved?	AG12.1–AG12.11	Yes. Observable inputs may not be available for NPOs' assets and liabilities.
b) Do you agree with the additional guidance provided for donated: <ul style="list-style-type: none"> i) Investment property (Section 16)? ii) Property, plant and equipment (Section 17)? 	G16.7 G17.10 G18.14	Yes. The guidance is consistent with section 24 of the IFRS for SMEs, <i>Government grants</i>.

7 Application of fair value	References	Responses
iii) Intangible assets (Section 18)? If not, why not?		

Question 8: Impairments

INPAG Section 27 requires that the carrying amount of an asset is reduced to the recoverable amount, where its carrying amount is higher than its recoverable amount. The new measurement base for inventories held for distribution at no or nominal cost has been added. The Section refers to an NPO's 'operating units' to encompass assets that are held for missional purposes rather than purely cash-generation.

8 Impairments	References	Responses
a) Do you agree that inventory held for distribution is measured for impairment using cost adjusted for any loss of service potential? If not, what would you change and why?	G27.2–G27.4	Yes, we agree. The loss in service potential will reflect reflection of decline in utility of inventory.
b) Do you agree that the term operating unit better reflects the nature of an NPO's operations and with its proposed definition? If not, what alternative term would you use and why?	G27.8	Yes, we agree. Most NPO operate based projects or programs, which may have a finite period and resources allocated to specific programs and operate independent of others.
c) Do you agree that impairments to assets that form an operating unit can take account of other economic benefits and service potential? If not, what would you change and why?	G27.15	Yes, we agree especially if it is a non cash-generating asset used for furtherance of the NPO mission.

Question 9: Combinations of entities

INPAG Section 19 applies to the combining of entities, (including NPOs) that meet the definition of a business. The term business has been broadened to include the types of activities carried out by NPOs. It provides guidance on the recognition and measurement of the assets and liabilities acquired in a combination and includes a simplification where there is a combination of two NPOs that both have positive net assets.

9 Combinations of entities	References	Responses
a) Do you agree that the term 'business' can be applied by NPOs when taken alongside the amendments proposed, (including the expansion of examples of control)? If not, why not? What practical issues are experienced?	G19.4, G19.5, AG19.1–AG19.2	No. NPOs do not carry out "business" and "business combinations" among them are not common. Perhaps consider using the term 'mergers' to describe the rare instances that they may combine their operations and provide simplified guidance on the accounting treatment. Consider including guidance under specialized activities.

9 Combinations of entities	References	Responses
b) Do you agree with the proposed exemption for two NPOs that have net assets and that it should not apply where one NPO has net liabilities? If not, describe the practical and accounting issues that arise?	G19.24	As above

Question 10: Other topics in Exposure Draft 3

INPAG Section 14 and INPAG Section 15 provide guidance on accounting for associates and joint arrangements in consolidated and separate financial statements respectively. INPAG Section 20 covers the accounting for all leases and INPAG Section 34 provides guidance on three types of specialised activities: agriculture, extractive activities and service concessions. None of these Sections have been amended other than for terminology changes.

10 Other topics in ED3	References	Response
a) Do you agree that no further alignment changes are needed to: i) Section 14 Investment in associates? ii) Section 15 Joint arrangements? iii) Section 20 Leases? If not, why not?	Section 14 Section 15 Section 20	No further alignment required on section. We are okay with the options provided for accounting for investment in associates No further alignments on section. We are okay with guidance on the 3 form of joint arrangement and the accounting options given No further alignments on section. We are okay with guidance on the 2 forms accounting for leases and the illustrative given given G20.15(b).
b) Is any of the guidance in Section 34 needed by NPOs? If yes, which elements of the section are needed and why?	Section 34	We are okay with guidance given on Agriculture, Exploration for & evaluation of mineral resources and Service concession arrangements.

Question 11: IFRS for SMEs Addendum

INPAG Section 7 and INPAG Section 30 (published in ED1 and ED2 respectively) have been updated as a consequence of additional text proposed in the Addendum to the draft Third edition of the IFRS for SMEs Accounting Standard issued by the International Accounting Standards Board on 28 March 2024. There is additional text on supplier finance arrangements in Section 7 and lack of exchangeability in Section 30.

11 Addendum	References	Responses
a) Do you agree that the guidance for supplier finance arrangements is useful and relevant to NPOs? If not, what would you change and why?	G7.20A–G7.20B,	Yes, we agree. However, supplier finance arrangements are not common by NPOs but the guidance could be used in the rare circumstances that the NPOs may enter into such arrangements.

b) Do you agree that the guidance on lack of exchangeability is useful and relevant to NPOs? If not, what would you change and why?	G30.5A, G30-31-32, AG30.26-AG30.43	Yes, we agree. The guidance would ensure consistency among the NPOs and with other entities using IFRS Accounting Standards and the IFRS for SMEs Accounting Standard. We agree that in the absence an exchangeable rate, then the entity should use an estimate spot rate and the disclosure there of.
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General Feedback

Please share any other comments that you wish to raise on Exposure Draft 3. When providing additional feedback please reference the paragraph numbers, where possible and provide a short explanation to support your comments.

Reference	Comment