



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:	Getnet	Country: (this should be the country in which you are based)	Ethiopia
Last name:	Haile	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) 	
Email:	getnet@targetethiopia.com		
Position:	Managing Partner		
Organisation: (who do you work for)	Target Business consultants plc		
Response submitted:	<ul style="list-style-type: none"> • on behalf of my organisation or • as an individual [Choose one]		
Please indicate whether you wish to receive further information about this project and consent to being contacted at the email address provided.			Agree Disagree

This document has been designed purely to enable feedback to Exposure Draft 3. Participation is undertaken on an entirely 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.

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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	I agree
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	I agree
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>I agree that income and expenses are tracked for each fund. Many accounting software solutions have features to generate revenue and expense statements by funds. The benefit is significant in terms of monitoring the use of funds for their specific and intended purposes, avoiding the mixing of funds, and ensuring accountability and compliance with donor requirements.</p> <p>It is often easier to have a separate bank account for each fund so that the cash assets of a specific fund can be reported separately. Many NGOs in developing countries receive funds from several donors. It is common to have a pooled bank account to manage small funds. Splitting a single bank account into multiple sub-ledgers complicates the accounting work and makes it difficult to reconcile bank accounts, as the ledger will be fragmented by fund sources. Another common</p>

1 Fund accounting	References	Response
		<p>scenario is where project staff members are responsible for receiving project advances to spend at field office levels where there are no bank accounts. The internal control of staff advances becomes complicated if NPOs are required to create project advances by fund, which means creating multiple advance accounts for a single staff member who deals with multiple funds. Most of the liabilities in project accounts may be related to employee tax payables or payables to vendors (and are very short-term). Classification of these accounts by fund will complicate and make the ledger and transactions bulky, while the beneficiary is the same (like the Revenue Authority). Property, Plant, and Equipment, and inventories may be funded by different funds, but existing accounting software is designed to manage and control non-financial assets by their unique ID (inventory ID or asset ID) or major class of inventory or assets.</p> <p>In my opinion, the revenue and expenditure report by funds provides a clear picture of the remaining funds by the end of the period for each fund, especially when we show the movement: opening fund balance, adding receipts for the period, less expenditure for the period, and closing fund balance. Presentation of assets and liabilities by funds will increase the burden on NPOs.</p>
d) Do you agree with the two criteria for a fund to be a fund with restrictions? If not, what would you change and why?	G36.9	I agree
e) 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?	G36.11–G36.12	I agree
f) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?	G36.21–G36.23	I agree

1 Fund accounting	References	Response
g) Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?	Implementation Guidance – Section 36	I agree

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	I don't agree From our context, I prefer the rebuttable presumption to be by output (or by nature – if the term nature properly express the output). I explained it further, below.
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	I don't agree. I recommend a disclosure by output rather. From my experience, there are two types of NPOs. The first type includes NPOs operating in generally defined and stable environments, such as hospitals and colleges. Their operations are generally similar, with changes mainly related to capacity utilization. In such cases, an input-based classification (i.e., by nature classification) provides useful information and can easily be compared with prior period performances.

2 Presentation of expenses	References	Response
		<p>For the majority of NPOs in my country, they do not have a defined scope of work from year to year. The nature of each project depends on the funding they receive. Some projects in a particular year may involve training costs, more stationery, more labor costs, etc., while other projects may involve capital item expenditures. In one particular period, NPOs may be busy with emergency activities (e.g., food supplies or vaccination). Comparing expenditures by nature across multiple periods does not make sense for any users unless there is an understanding of the activities performed. Output-based expense classification makes more sense for the second group of NPOs.</p>
<p>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?</p>	<p>G24.46, AG24.48</p>	<p>I agree</p>
<p>d) Do you agree with the expense disclosure requirements? If not, what would you change and why?</p>	<p>G24.50–G24.57, G33.7–G33.11, G28.38</p>	<p>I agree</p>
<p>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?</p>	<p>G24.48–G24.49</p>	<p>I agree, considering a general comment I provided below regarding a specific requirement by the regulatory body in the presentation of statement of revenue and expenses.</p>
<p>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?</p>	<p>G24.64–G24.66</p>	<p>I agree</p>

2 Presentation of expenses	References	Response
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	I agree
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	I agree
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)	I agree

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	G37.1-G37.2	I agree

3 INPAG Practice Guide 1	References	Response
1- Supplementary statements? If not, why not?		
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	I agree
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	<p>I agree partly, with the following remarks:</p> <ul style="list-style-type: none"> • The budget report to indicate a budget comparison column, together with budget utilization rate. The burning rate gives insight about the implementation capacity of the reporting entity. • A reconciliation template for financial budget utilization % and activity accomplishment percentage • Supplementary information is highly useful for users who wish to understand the performance of NPOs in-depth, particularly in terms of achieving program objectives. Therefore, an output-based expense presentation is much more relevant than an input-based (by nature) presentation. The main report provides information by the nature of expenses. The supplementary information should address the deficiencies of the main report. • From my experience, most donor-based grants (unlike budget supports) are activity-based (whether it is EGA or OFA), where budget line items are expressed in terms of output (e.g., training costs for 50 youth entrepreneurs or 40 single mothers). Donors might not be interested in seeing expenses by nature (or input) such as per diem, trainer fees, stationery, etc., but rather the expenses incurred for the specific output. • Additionally, the budget comparison report will be easier and more practical if expense items are prepared in the same pattern as budget line items instead of a generic input-based chart of accounts.
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	I agree

3 INPAG Practice Guide 1	References	Response
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	I agree

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	<ul style="list-style-type: none"> • Member based NPO’s have membership contribution as a revenue, so “membership contribution” is relevant item in statement of income and expenses. • “Service in Kind” is an important item for some NPOs, which are required to express the value of community mobilization (as part of the commitment for community in kind contribution) for the specific program implementation. • Impairment of Property, Plant and Equipment is more relevant to NPOs than inventories (in our context) • “Advance to subgrantees” and “work advances” are common current asset items for NPOs in Ethiopia • “Severance Pay” – long term employee benefit payables are common long term liabilities in NPO environment. •

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	I agree
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 don't have a situation where a minority or sort of shareholding will be available in NPO. It may work for other jurisdictions but not for us. Hence, "equity claim" is not a relevant
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	Such things are not available in our context, in any of the NPOs operating in our country.

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	G38.11–G38.12	Yes, I agree.

6 Transition to INPAG	References	Response
practical challenges that are likely to be experienced?		
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	I agree. For most of the NPOs, a two-year transition period is quite workable and reasonable to allow a two years transition 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 (eg 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, eg 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	It is very useful
b) Do you agree with the additional guidance provided for donated: i) investment property (Section 16)? ii) property, plant and equipment (Section 17)? iii) intangible assets (Section 18)? If not, why not?	G16.7 G17.10 G18.14	I agree with all the three additional guidance provided

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	I agree in principles, but it requires a materiality threshold as the cost of measurement of an impairment loss will be very high (NPOs may not have the expertise and the time to do the research for impairment measurement). In our case, most of the NPOs keep inventories for a very short period of time (until distribution) and might not be worth to do the impairment assessment and measurement at the reporting date. Inventories are generally representing the small percentages of most NPOs assets.
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	I agree
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	I agree

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	G19.4, G19.5, AG19.1–AG19.2	I agree in general terms. The practical challenges will be measurement of any good will, if any, when there is no considerations paid by the NPOs in exchange for the receipt of the business unit (

9 Combinations of entities	References	Responses
control)? If not, why not? What practical issues are experienced?		example, transfer of a school it used to be run by government, or a private company to an NPO as a grant). As per G19.4 (f), there will be an agreement for transfer.
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	

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	I agree.
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	Yes, Agriculture is relevant in our case. Section G34.2 – G34.12 I very much agree with the phrase “...without undue cost or effort.” Under G34.2 Under the existing law, it is unlikely that NPO in our country to be engaged in Exploration for and evaluation of mineral resources, and any service concession agreements.

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,	<p>I don't agree. I don't have any experience with such sort of arrangement in NPO context in Ethiopia. It is common in business organizations.</p> <p>It is common for some donors to make payments directly to suppliers on behalf of NPOs. This transaction affects both revenue and expenditure (or assets, as applicable) and impacts how we should report it in the cash flow statement. Although it does not have a cash flow effect, it does involve revenue and an expense or an investment activity if the item purchased is property, plant, and equipment.</p>
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	I don't agree. This is not relevant in our contexts. It is extremely unlikely to happen in our case that non-exchangeable currency can be received by an NPO. NPOs are only allowed to receive funds in national currency, if in cash, otherwise through bank transfer, in which case, the bank accounts to be opened are in limited currencies which are all convertible.

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
	<ul style="list-style-type: none"> • Road map for adoption: The national regulator, AABE, should provide guidance (roadmap) for the implementation of INPAG. It is also very important to coordinate the following tasks <ul style="list-style-type: none"> ○ Training to users ○ Awareness creation to donors at national level so that they can harmonize their reporting requirements and guidelines so that unnecessary burden can be left from NPOs ○ National regulators, such as the Agency for Civil Society Organization in Ethiopia, to harmonize its reporting requirements in line with the INPAG, to reduce a reporting burden and to integrate some of the specific requirements as part of disclosure / or supplementary report.

Reference	Comment
	<ul style="list-style-type: none"> ○ One of the requirements of the national regulator of CSOs is presentation of disclosure of expenses by program and administration classification. Admin costs should not exceed 20% of the total revenue received during the period. Auditors are required to provide assurance whether these requirements are met (or to give assurance the figures provided by the NPO is accurate. All CSOs / or regulated NPOs are currently required to provide this information, a classification by function (not by nature). The shift to by nature classification, and the allocation of support costs to specific funds will eliminate admin costs from presentation. INPAG should allow a room where national requirements to be entertained to respond to specific requirements. ● Threshold between small NPOs <ul style="list-style-type: none"> ○ There are several small NPOs who will not have the capacity to employ a qualified accountant to implement and produce financial reports in accordance with INPAG or may not have the budget to employ a qualified accountant to prepare their financial report in accordance with INPAG. Hence, like with have IFRS for SMEs, the requirement for the adoption of INPAG (if required by the regulator as a mandatory), should be only for those who can afford financially (with a threshold of turnover and other parameters).