



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 the 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:	Not Applicable / Organisation response	Country: (this should be the country in which you are based)	Switzerland / Global
Last name:	Not Applicable / Organisation response	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:	Not Applicable / Organisation response		
Position:	Not Applicable / Organisation response		
Organisation: (who do you work for)	The Global Fund to Fight AIDS TB and Malaria		
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	

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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	<p>We agree with this. Our preference would have been to have a distinction between restricted and unrestricted funds on the income and expenditure statements and backed by notes to the financials.</p> <p>However, we have learnt that there is a mandatory note to the financial statements which has been referred to as the “Fund accounting note” which will also provide the restricted / non restricted segregation in more details including the names, income, expenses, and balances for restricted donors. What would be useful would be to have a disclosure of who the main unrestricted donors are since this appears as a one liner in the mandatory note to the financial statements</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>Agree on both definitions</p>
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>Restricted funds – By default either the “enforceable grant agreement” or “other funding arrangements” will need to be tracked since this would be a donor requirement</p> <p>Unrestricted funds – No requirement for tracking would exist</p> <p>A practical consideration would be to have a Financial Management information system which can handle multi-donor / multi-currency</p>

1 Fund accounting	References	Response
		transactions, well defined procedures for tracking in the manual of procedures and well-trained staff to manage this.
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	Agree with the definitions under 36.9
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	Agree – this aligns with the “fair share” principle where each funder should cover their fair share of expenses related to their funding. We also agree that on the proposal around Negative fund balances i.e., these shall be reviewed at the reporting date to determine if it is a temporary shortfall that will be addressed in a future reporting period or whether it is a permanent shortfall that needs to be addressed by the NPO transferring funds from their unrestricted funds.
f) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?	G36.21–G36.23	Agreed and nothing to add.
g) Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?	Implementation Guidance – Section 36	The illustrative examples provide the key concepts as relates to fund accounting.

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 does not 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	The classification of costs by nature is the most reliable way of presenting information to users of the financial statements. If needed other forms of presentation could be added to the notes to the financial statements.
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 agree to have the default / benchmark treatment a classification of expenses by nature. If there is a rationale for using a classification other than by nature the same should be disclosed.
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 agree with this.
d) Do you agree with the expense disclosure requirements? If not, what would you change and why?	G24.50–G24.57, G33.7–G33.11, G28.38	We agree with the disclosure requirements (It is the same as IFRS, Key management personnel, employees' benefits, related parties)
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 agree with the descriptions. We also note that this is important for transparency and accountability, but it will increase the complexity, and we need better trained accountants.
f) Do you agree that commercial and trading activities that are for the purposes of fundraising and investment management costs associated with a	G24.64–G24.66	We agree with this and note that a few non-profit organizations have income generating activities for the purpose of fundraising to increase their funding base

2 Presentation of expenses	References	Response
fund whose purpose is to generate future returns are included as fundraising activities? If not, why not?		
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	We agree with this proposal
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	We agree with this proposal
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)	We agree that only transactions which are not made at an arm's length 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	We agree with this requirement since supplementary statements are prepared
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	The idea of the supplementary statement is to provide similar information as would be found in the special purpose financial statement. If the information is available in the general-purpose statement and the notes to the financials, there is an argument not to provide the same in the supplemental statements.
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	<p>In general, we agree with the format of the supplementary statements as outlined in the practice guide. However, what needs to be improved is the classification of expenses in the income and expenditure statement. It is a given that each donor has a way of categorizing expenses. The best-selling point to all donors would be to demonstrate that</p> <ul style="list-style-type: none"> - You have taken into account the current classification formats of all the major donors and the supplementary statements reflect the best attempt at harmonization - The donors could use supporting notes or subcategories of the main cost grouping in order to get more granular information <p>Whereas it would be impossible to get a format that would suit all donors, this strategy could improve the adoption across the board.</p>
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	We agree with the options for disclosure
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	We agree with this.

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	We agree with this presentation.

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 are 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 this
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 this
c) Do you agree that the paragraphs relating to the sale of options, rights and warrants, extinguishing financial	G22.12–G22.15	We agree with this

5 Equity	References	Response
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?		

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	<p>The proposals on first time recognition are technically sound and there are no major comments. We also recognize that these approaches are designed to ease the transition for NPOs (allowing NPOs to adopt INPAG over time rather than all at once, reducing the complexity of initial disclosures and reporting requirements, providing exemptions or reliefs for certain requirements)</p> <p>In terms of practical challenges</p> <ul style="list-style-type: none"> - Buy in from the major donors. I think a bigger push can be made to get all the big donors on board – EU / ECHO, WB, UN agencies which make grants to NPOs. Most NPOs will adopt more easily once the donors have expressed willingness to support. - Technical support to ensure that training is properly cascaded to both implementers and regulators are well supported during first time adoption - Financial Management systems upgrade to allow for more accurate reporting.

6 Transition to INPAG	References	Response
		<ul style="list-style-type: none"> - Resource constraints, especially with the smaller NPOs, could be a hinderance. - Potential overlaps with regards harmonization of NPOs financial reporting with PFM Systems as part of sustainability and Paris Declaration. - INPAG knowledge Capacity gaps from external auditors that will provide assurance over the financial statements especially for smaller audit-firms.
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.

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	We agree with this

7 Application of fair value	References	Responses
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)? iii) intangible assets (Section 18)? If not, why not?	G16.7 G17.10 G18.14	We agree with this

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	We agree with this.
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	We agree with this. This term emphasizes the functional and operational aspects of the organization, highlighting how it manages its resources, processes, and activities to achieve its mission.
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	We agree with this

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	We agree with this
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	We agree with this

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	We agree with this
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 agree with this

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,	We agree with this
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	We agree with this

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