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:

<table>
<tr><td>**First name:**</td><td>Mark</td><td>**Country:** (this should be the country in which you are based)</td><td>Vietnam</td></tr>
<tr><td>**Last name:**</td><td>Jerome</td><td rowspan="5">**Professional interest:** please choose from:
• 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)</td><td rowspan="5">Auditor</td></tr>
<tr><td>**Email:**</td><td></td></tr>
<tr><td>**Position:**</td><td>Self-employed consultant</td></tr>
<tr><td>**Organisation:** (who do you work for)</td><td>**Self-employed**</td></tr>
<tr><td>**Response submitted:**</td><td>• as an individual
[Choose one]</td></tr>
<tr><td colspan="3">Please indicate whether you wish to receive further information about this project and consent to being contacted at the email address provided.</td><td>Agree
~~Disagree~~</td></tr>
</table>

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.

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 am happy for this requirement to be removed, but there should be a statement clarifying that, if this information is not presented on the face of the Statement of Income and Expenses, it should be disclosed in the Notes to the Financial Statements.**
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	**Yes, 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	**Yes, I agree.**
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	**The criteria for a fund to be a fund with restrictions should be based on IAS 37. In particular, the concept of constructive obligations ("A constructive obligation arises from the entity's actions, through which it has indicated to others that it will accept certain responsibilities, and as a result has created an expectation that it will discharge those responsibilities.") should be applied here.**

1	Fund accounting	References	Response
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	**Yes, I agree.**
f)	Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?	G36.21–G36.23	**Yes, I agree.**
g)	Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?	Implementation Guidance – Section 36	**Yes.**

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	**The ideal presentation would be a matrix, showing expenses analysed by nature and function. From my experience, they are not difficult to prepare – however, they do need accounting staff to apply them consistently and in a disciplined fashion.** **Whichever classification an NPO adopts, it should be required to maintain a consistent approach from one reporting period to the next, with any change in classification being treated like a change in accounting policies (i.e. properly explained and with comparative figures amended to help users understand 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	**Subject to my comment in (a) above, yes, I agree.**
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	**Subject to my comment in (a) above, yes, I agree.**
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	**1. IPSAS 24 (Presentation of Budget Information in Financial Statements) requires entities that make their approved budgets publicly available to include a comparison of the budgeted and actual amounts in the financial statements. This requirement is a useful discipline on preparers and approvers of budgets and I would therefore include such a requirement in INPAG.** **2. I recommend amending G28.38A to make it clear that the exemption does not apply to members of the governing body who are also employees. (This could simply be a cross-reference to G33.9(b).)** **3. Should the required disclosures of compensation under G33.7 and G33.10 follow the same analysis as under G28.38?**

2 Presentation of expenses	References	Response
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	**Yes, I agree.**
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, I agree.** **However, I would find it helpful if G24.64-65 could be illustrated with examples.**
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, 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	**Yes, 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)	**Yes, I agree.** **I noted some typos in the paragraphs surrounding G33.18:** • **In G33.10, the reference to G33.8(b) should be to G33.9(b);** • **In G33.16, the reference to G33.13 should be to G33.14;** • **In G33.21 the two references to G33.15 and the reference to G33.16 should be to G33.16 and G33.17, respectively;** • **In AG33.2, should the reference to G33.8-G33.10 be to G33.8-G33.12?** • **In AG33.3, the reference to G33.15 should be to G33.16; and**

2 Presentation of expenses	References	Response
		• **In AG33.4, the two references to G33.17(a) should be to G33.18(a).**

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, I agree.** **I would like to add:** • **Is it worth including any reference to the 2005 Paris Declaration on Aid Effectiveness? The development of INPAG seems to be very well aligned with that declaration.** • **A number of donors have rules and restrictions on what expenses they will allow to be included in financial statements presented to them. Can INPAG include guidance on the treatment of expenses that donors will not recognize? Should there be a requirement to reconcile Supplementary statements to the financial statements?**
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, I agree.**
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	**If an NPO presents budget amounts (in accordance with S5.24), this should follow the provisions of IPSAS 24 (Presentation of Budget Information in Financial Statements): i.e. it should include the difference between the budget and actual amounts (in currency and percentage terms) and an analysis of significant variances.**

3 INPAG Practice Guide 1	References	Response
		Otherwise, I agree.
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	**Is the intention to require NPOs to make a choice, either to disclose both capital and inventory related costs, or to disclose neither? Or are they permitted to disclose capital and/or inventory related costs?** **Do we need to require NPOs to report consistently from one year to the next? (i.e. if they choose to report capital and inventory related costs one year, they must continue doing so or explain why?)**
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, 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	• **An organization performing medical research and supporting people suffering from respiratory diseases could be expected to have entered into some long-term contracts. I do not see any evidence for accounting policies or treatment.** • **Shouldn't the NPO recognize a contingent liability for patients reacting adversely to medicines, especially when it is receiving medical supplies with a short shelf life (and thus runs an increased risk that medical supplies may be used after their expiry date)?** **Otherwise, yes, I agree that the illustrative financial statements cover transactions prevalent for NPOs.**

		I have the following questions and suggestions on the illustrative financial statements: **1. In the Statement of Income and Expenses, should the income from EGAs in 20X1 be "0" or "-"?** **2. In Note 1, I would recommend including a short summary of activities in the year (identifying in particular all grants with restrictions).** **3. In Note 2, there is a typo in the first paragraph of "Property, Plant and Equipment". In the second sentence, "every" should be deleted.** **4. In Note 5, I suggest adding the CX/CU exchange rate to how the revenue for the research database amounts to CU70,000.** **5. In Note 7:** **a. I recommend adding a cross reference between the description of asthma medication to Note 13, where it is explained how the unused inventory is being accounted for.** **b. I recommend adding a cross-reference between the description of the minibus and Note 12.** **6. In Note 12, there is a reference to additions to intangible assets and a cross-reference to Note 4. However, I seem to be missing something here!** **a. The additional assets are shown in Note 4, but their amortization does not appear to be shown there.** **b. The description indicates that amortization charge for the year amounts to CU6,000 (CU11,000 – CU,5,000). However, in the table at the start of Note 12, the charge for the year is CU5,000.**

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	**Yes, 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	**Yes, I agree**
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	**Yes, I agree**

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	**Should the provision in G38.12(j) apply to other extractive activities as well as oil and gas? (In particular, I would expect some NPOs to be involved in extractive activities connected with renewable energy.)** **Otherwise, I agree with the proposed approaches.**

6 Transition to INPAG	References	Response
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	**Yes, I agree.** **I also recommend amending G38.4(b) as follows: "National requirements" should be "national or other requirements". (I am thinking particularly of organisations that are currently applying Cash-basis IPSAS.)**

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	**Yes, this is useful.** **I have the following additional comments:** • **G12.6 states that "The NPO must have access to the principal (or most advantageous) market at the measurement date." I recommend making it clear that, if the NPO does not have such access, it may not apply fair value measurement.** • **Example 6 of the Implementation Guidance (page 178) states that the fair value should "reflect the salary / cost of a doctor with equivalent experience in country B". However, it is not clear what should be done if there are no doctors with such equivalent experience – and the premise of the example (doctors from country A are providing training in country B) suggests that doctors in country B will not have such experience.**
b) Do you agree with the additional guidance provided for donated: i) investment property (Section 16)?	 G16.7 G17.10	**Yes, I agree.**

7 Application of fair value	References	Responses
ii) property, plant and equipment (Section 17)? iii) intangible assets (Section 18)? If not, why not?	G18.14	

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, I agree.** **I note there are typos in the paragraph numbering on pages 102-103; there are two sets of paragraphs numbered G27.4 and G27.5.**
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, I agree.** **I suggest expanding the indications of possible impairment in G27.9 to include indications of impairment arising from a loss of service potential.**
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, 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 control)? If not, why not? What practical issues are experienced?	G19.4, G19.5, AG19.1–AG19.2	**I am concerned that the term 'business' could cause confusion between NPOs and commercial organisations. I would therefore prefer a more neutral term, such as 'entity'.** **In addition, I have the following questions and comments:** • **Does the term "equity instruments" in G19.59(b) include any claims against equity?** • **I suggest expanding the definition of 'output' in G19.1(c) to include any other activity or result that may support the goals of the NPO.** • **In G19.19(c), I also recommend replacing the comma between "beneficiaries" and "customers" with "and/or".** • **There are typos in the paragraph numbering on page 79; there are two sets of paragraphs numbered G19.2.** • **An example of the concentration test (G19.2-3) would be very helpful.**
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	**Yes, I agree**

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	**Yes, 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, I have already encountered NPOs involved in agriculture and using service concession arrangements. As regards exploration for and evaluation of mineral resources, I would expect some NPOs to be involved in extractive activities connected with renewable energy.**

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, I agree**
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	**When discussing the ability to obtain another currency and currency markets (AG30.31-32), it is not clear whether the use of informal markets and the rates issued in those markets will be considered. From my own experience, in Vietnam, Laos and Myanmar, such markets have at times been well-organised and have had as much (or more) credibility than the official government markets.** **Otherwise, yes, I agree.**

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
G33.2	**Related parties are identified as being a close family member. However, this is very limiting and may miss other close relationships (e.g. university colleagues, school colleagues, teachers and students, etc.). I therefore recommend that the definition be expanded to include anyone whose relationship may lead to expectations (or perceptions) that transactions between the persons might not be conducted on an arm's length basis.**
Page 161 – title before BC24.58	**Since "natural classification" could be misunderstood, I recommend that it be amended to "classification by nature"**