

IFR4NPO Project

Advice and Requests Technical Advisory Group meeting

28 February 2023

TAGED10





Session outline

Revenue

Grant expenses

Foreign currency translation

Non-prioritised Sections



- a) The two separate parts follows the rules of the road. It would be enhanced by flowcharts, and/or a decision tree, to help users navigate the document. A side by side chart that shows a comparison of the terminology between Part I and Part II would be helpful.
- b) Support a single integrated section for revenue, but if they are separated support the approach taken with grants and donations first.
- c) Suggest we exercise caution in asking a question about the separation of the sections. Suggest that fieldwork is used ahead of the ED coming out.
- d) The extent of the duplication between Part I and Part II is not overwhelming.
- e) Having the steps in order in Part I is helpful and it may be helpful to be more explicit about the headings and make the link to Part II



- f) Important to have a preface to help navigation. Additional examples might include a transaction that involves Part I and Part II.
- g) The Preface comes across as being rules based and it would be better to be more clearly principles based. For example, need to consider where a transaction extinguishes a liability.
- h) Consider the use of terminology particularly reciprocal vs non-reciprocal and 'significantly below fair value' rather than 'nominal value' as this can be a matter of judgement.
- i) Is the term 'binding grant agreement' wide enough for the range of resources. It needs to be clear in the guidance. Could the term be broadened to binding grant/donation arrangement.
- i) Check that terminology is being used consistently, particularly arrangements with no restrictions and no binding arrangement.



- j) Note that the 5 step model in Section 23 of IFRS for SMEs has been welcomed in outreach in a number of regions because of the simplifications that it provides, but this is not universal.
- k) For services in-kind the idea of 'would otherwise have been purchased' may be problematic and the focus should be on reliable measurement, or on disclosure rather than recognition. Services in -kind that are recognised should be linked to their criticality to the NPO's mission. The rationale for recognising non-cash donations are not landing with some stakeholder groups.
- Need to be clear whether we are proposing a practical expedient or permitted exception for goods in-kind and services in-kind. View that practical expedient is a simplification and permitted exception means that a requirement doesn't have to be met.
- m) Are donations adequately covered, for example on-line donations to meet a specific purpose. Need to be clear as to the extent that this is a binding arrangement.



- n) The wording of G23.68 might introduce a level of optionality in terms of point of time versus over time, rather than providing the additional guidance as intended.
- o) Have a reference to compliance obligations in the definition of a binding grant agreement to provide clarity about whether a binding grant arrangement can have restrictions (which are not compliance obligations).
- p) Where a binding grant arrangement requires a matching grant clarify whether this is a grant arrangement with restrictions.
- q) Support the approach that the illustrative examples focus on grants and donations rather than contracts with customers, noting that IFRS for SMEs does not include illustrative examples.



1.2 Requests		
a)	Explore the use of flow charts and means to help navigation and to understand the relationship between terminology in Part I and Part II.	
b)	Include a range of examples in the Implementation Guidance to illustrate the concepts including an example of on-line donations, grants and services in-kind and non-cash consideration.	
c)	Include an SMC on measurability of services in-kind.	

d) Explore the position of text on services in-kind around reliable measurement and whether recognition is permitted or required.



1.2 Requests		
e)	In the simplified approach for single compliance obligations be clear about which steps aren't necessary.	
f)	Consider whether a section on terminology is need before the accounting for transactions	
g)	Include an SMC on the amount of disclosure that is needed	
h)	Explore the use of flow charts and means to help navigation and to understand the relationship between terminology in Part I and Part II	



Agenda item 2 – Grant expenses

- a) The proposed title of the section is too long and an alternative should be considered, noting the US uses contributions made.
- b) The definition of grant expense may be too broad and could include all programme work.
- c) General obligation may not be sufficient for deferral. Need to be careful not to blur the line between restrictions and compliance obligations. A matching grant may create an obligation but then once the arrangement is in place the funds could be unrestricted.



Agenda item 2 – Grant expenses

2.1 Advice

d) This section should more closely mirror the revenue section.

- e) With regard to the enforceablility of customary practices, this seems to create a higher hurdle for recognition of a constructive obligation than used by the IASB, which may not be the intention.
- f) It is questionable whether general statements made by an NPO are likely to give rise to a constructive obligation.



Agenda item 3 – Foreign currency translation

3.1 Advice

- a) The reasons for the proposed additional disclosure for gains and losses on exchange are not clear.
- b) The proposed disclosure needs to make clear whether it is a presentation or disclosure requirement.
- c) The examples are good and helpful. The policy on the use of restricted and unrestricted presentation needs to be clear in the core guidance.

d) Noted that the IASB have a project on lack of exchangeability.



Agenda item 4 – Non-prioritised Sections

4.1 Advice

a) Not clear why Section 26 is needed and the basis for conclusions does not make this clear.



Agenda item 4 – Non-prioritised Sections

 4.2 Requests

 a) Remove Section 26 from ED 2.