



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:	Ersa Tri Wahyuni	Country: (this should be the country in which you are based)	Indonesia
Last name:		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) 	academic
Email:			
Position:	Member of Audit and Risk Management Committee, Board of Trustee, Universitas Padjadjaran Also associate professor in Accounting		
Organisation: (who do you work for)	Universitas Padjadjaran		
Response submitted:	<ul style="list-style-type: none"> • on behalf of my organisation or • as an individual 		
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.

1. [Question 1: Fund accounting](#)
2. [Question 2: Presentation of expenses, fundraising costs and related disclosures](#)
3. [Question 3: Supplementary information and INPAG Practice Guide 1 – Supplementary statements](#)
4. [Question 4: Illustrative financial statements](#)
5. [Question 5: Equity](#)
6. [Question 6: Transition to INPAG](#)
7. [Question 7: Application of fair value](#)
8. [Question 8: Impairments](#)
9. [Question 9: Combinations of entities](#)
10. [Question 10: Other topics in Exposure Draft 3](#)

11. [Question 11: IFRS for SMEs Addendum](#)

12. [General Feedback](#)

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>I disagree with the removal of Restriction category on the face of financial statements as it is very helpful for the readers. Universities in Indonesia, especially government universities received funding from the government with restrictions. Most of charity institutions in Indonesia also receive funding with restrictions.</p> <p>However, the presentation of the financial statements of many charity organisations in Indonesia clearly separated the “fund financial reports” with the “management financial reports”. We propose that the separation of financial statements would still in compliance with INPAG.</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>INPAG TRG please be aware that in the paragraph AG 36.1 still shows the definition of restriction fund from G 2-74 in Section 2. Does it mean that Paragraph G2-74 still alive and moved to the Paragraph AG 36,1?</p> <p>An unrestricted fund can become restricted in the later days and vice versa. The guidance in Figure AG16.1 should be applied every reporting date not only in the beginning of the fund recognition. For example, a charity organization may received cash donor without restriction but later on the organization made a</p>

1 Fund accounting	References	Response
		<p>public announcement that such fund would be use to build a mosque. The fund then can become with restriction.</p> <p>“Equivalent arrangements” need to be clarified which may include widely recognized religious norms. For example an Islamic charity institution in Indonesia may received “Zakat” fund which does not have any arrangement with the donors. However, both donors and charity organization must comply with the Islamic norm that the funding can only be distributed for consumption (not as working capital) to specific types of recipients (8 types). This should be fall under fund with restrictions as well.</p> <p>With the current guidance, I am afraid the “zakat fund” will be fall under “without restrictions” where all the current practices in Indonesia and Malaysia are fund with restrictions. The restrictions for zakat fund are the type of recipients and the purpose (for consumption), but the timing and the activities may be determined later. INPAG need to have more examples to include Zakat fund.</p>
<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?</p>	<p>G36.5, G36.7, AG36.3</p>	<p>Yes I agree. Although this may need a more sophisticated accounting system. For practical considerations maybe only material fund that should be fall under this requirement. So any fund that above 5% from total cash inflow.</p>
<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?</p>	<p>G36.9</p>	<p>Please see my comment on number b.</p> <p>I would like to emphasise the importance to clarify of “equivalent arrangements”. It should include the non-written arrangements of a widely accepted religious norms or rules.</p> <p>“Equivalent arrangements” need to be clarified which may include widely recognized religious norms. For example an Islamic charity institution in</p>

1 Fund accounting	References	Response
		Indonesia may received “Zakat” fund which does not have any arrangement with the donors. However, both donors and charity organization must comply with the Islamic norm that the funding can only be distributed for consumption (not as working capital) to specific types of recipients (8 types). This should be fall under fund with restrictions as well.
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	<p>Yes, I agree. Even tough under the agreement with the donor it should not be charged to that fund, if the expenses do exist, we need to recognize it and charge to the fund. In the donor report, we may report differently in accordance with the agreement with the donor. However, for the general-purpose financial statement we need to report everything. Only by that we can compare the efficiency of NPOs across entities.</p> <p>In Indonesia, the practice varied across organizations. Some charity organization “absorbs” the expenses of fund under general fund, especially for the excess above the limited threshold.</p>
f) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?	G36.21–G36.23	I agree with this. However in some organisations in Indonesia they also use the term “increase and decrease” of Net Asset
g) Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?	Implementation Guidance – Section 36	<p>The implementation guidance of section 36 (about the truck for outreach program) is too simplistic. In the real world, the truck would be used for several type of activities programs. How should entity allocate cost of the truck to each fund in accordance with G 36-11 and G 36-12?</p> <p>INPAG need to have examples which relates with the real world problem.</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	Although I agree with this, however classifying by nature of the expenses requires more sophisticated accounting system especially if we need also distinguish the expenses in accordance to its fund source.
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	Yes 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	Yes 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	Yes agree
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	Although this is a good idea but the “direct cost, shared cost and supports cost” will add more complexities especially if we ask the NPOs also to think the “nature” of the expenses. For example, support cost usually by function and not by nature.

2 Presentation of expenses	References	Response
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 agree. If commercial activities are widely communicated to the public as part of the fund raising activities, It should be included as fundraising activities.
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	It would really depend on how clear the entity can split the fundraising activities with non-fundraising activities in a combined activity. For example when a charity organization recruited volunteer to collect donation in a shopping mall, but the time split is quite clear (every alternate day, the volunteers promote the awareness of the NPOs), then splitting the cost can be easily done. However if it is too difficult for the NPOs to split the cost as the activities are inherently combined and can not be distinguished separately, then the entity can combined the cost.
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)	NOT agree. The information if an NPOs is highly rely only to ONE or few institutions is crucial to assess the sustainability of the NPOs. For example an NPOs may be relied its donations only from one company. If that company has financial program, the sustainability of the program would be questionable. Information of related party is very important for other donors to assess the sustainability of an NPOs.

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 agree
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 agree
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	Yes 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	The term capital in NPO should be replaced with the term net assets. Because NPOs are not sourced from the capital of the organization but from grants or other sources of funds sourced from other parties.
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 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
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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	Yes agree
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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	The details of net assets must include the initial asset receivables, assets sourced from the management and development of initial assets, and the net proceeds from asset management and development. These figures should not be derived by deducting assets from liabilities.
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	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	G22.12-G22.15	Agree

5 Equity	References	Response
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	Agree, The practical challenge that will be faced is the lack of preparedness of managers to implement this, due to a lack of competence in preparing financial reports. There is also a lack of awareness of the importance of presenting reports to the public.
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 disagree because it's too short a period for all NPOs to adopt INPAG. It would be better for NPOs applying for foreign funding to adopt INPAG during the 2-year transition period. For other NPO the transition should be 3-5 years.

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, it's useful. However maybe it also should include the use of "1" for invaluable asset such as historical assets. For example universities may receive donations in-kind of rare book collections which is very difficult to get the fair value.
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	Yes agree. However, If the cost to measure the fair value will overweight the benefit, the value of "1" should be allowed.

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	Agree, Religious social institutions in Indonesia do not currently apply depreciation. Impairment is recognised as an asset impairment account in the statement of activities.
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	agree
c) Do you agree that impairments to assets that form an operating unit can take	G27.15	A depreciation in asset value will affect the economic benefits of the asset and threaten to undermine services. However, in Indonesian religious social

8 Impairments	References	Responses
account of other economic benefits and service potential? If not, what would you change and why?		institutions, waqf assets cannot be transferred unless they are used for purposes in accordance with the general spatial plan.

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	Yes agree
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	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	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	I agree

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,	It is very rare case that a NPOs is involved in the supplier finance 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	This can be useful for charity organization who have operation in conflict countries where the lack of exchangeability can be a significant challenge.

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
	Please provide more examples which are relevant and not "too easy" cases.