



INTERNATIONAL FINANCIAL REPORTING FOR NON PROFIT ORGANISATIONS

International Non-profit Accounting Guidance (INPAG)

Exposure Draft 2

Response template

Please use this form to record your responses to the Specific Matters for Comment relating to [INPAG Exposure Draft 2](#)

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 12 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 **15 March 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



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Respondent information:

First name:	Soraya	Organisation: (who do you work for)	Inyathelo-The South African Institute for Advancement
Last name:	Joonas	Response: Are you submitting your response <ul style="list-style-type: none"> • on behalf of my organisation • as an individual 	On behalf of my organisation
Email:	soraya@inyathelo.org.za	Country: (this should be the country in which you are based)	South Africa
Position:	Finance Director	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) 	Preparer Civil Society Other: NPO Advocacy for an enabling environment NPO Civil Sector Convenor Capacity building in the Civil Society Sector in order to attract resources and build financial sustainability

Please indicate whether you wish to receive further information about this project and consent to being contacted at the email address provided.	Tick boxes Agree Disagree
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This document has been designed purely to enable feedback to Exposure Draft 2. 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: Financial instruments		
<p>INPAG Section 11 provides guidance on the treatment of financial assets and financial liabilities. It has two parts, Part I that addresses simpler financial instruments and Part II that addresses more complex financial instruments. There are no significant changes other than alignment with other sections.</p>		
	References	Response
a) Do you agree that there are no significant alignment changes required to Section 11, other than those that have already been made? If not, set out the alignment changes you believe are required.	Section 11	Agree

Question 2: Inventories		
<p>INPAG Section 13 provides guidance on the recognition, measurement and disclosure of inventories. Major changes have been made to broaden the scope of this section to include NPO specific inventory and set out their measurement, where inventories held for use or distribution to be measured at the lower of cost adjusted for any loss of service potential and replacement cost. It has been modified to allow the use of permitted exceptions where certain donated items are not recognised in inventories. It has also been amended to allow NPOs to expense services to be provided to service recipients for no or nominal amounts as incurred rather than as work in progress within inventories. Disclosures have been updated to address the use of permitted exceptions and where donated inventories cannot be reliably measured.</p>		
	References	Response



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a) Do you agree with the expansion of Section 13 <i>Inventories</i> to specifically include inventory held for use internally, for fundraising or distribution? If not, why not?	G13.1	Agreed
b) Do you agree with the permitted exceptions that allow for certain donated inventories and work in-progress that comprises services to be provided for no or nominal consideration to not be recognised as inventory? If not, what would you propose instead/.	G13.2, G13.5 (a)-(c)	<p>Partly</p> <p>Could the exemptions also include not just donated items, but items that funding has been received for and already expensed i.e. produced prints of publications distributed for free and/or sale, supplies for training etc.</p> <p>-will the transition affect nonprofits significantly in the year of transitioning to this disclosure, in their accounts and result in a significant deficit?</p>
c) Do you agree that fair value should be used to value donated inventory? If not, what would you propose instead?	G13.7	<p>Agreed</p> <p>Could this still become subjective though?</p>
d) Do you agree that inventories that are held for distribution at no or nominal consideration or for use by the NPO in meeting its objectives shall be measured at the lower of cost adjusted for any loss of service potential, and replacement cost? If not, what would you propose instead?	G13.8	Agree



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<p>e) Do you agree with the proposed disclosure requirements, particularly regarding the use of permitted exceptions and where donated inventories are not recognised because they cannot be reliably measured? If not, what would you propose instead?</p>	<p>G13.26 (e), G13.27</p>	<p>Agreed Many may choose this option</p>
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<p>Question 3: Provisions and contingencies</p>		
<p>INPAG Section 21 provides guidance on the recognition, measurement and disclosure of provisions (being liabilities of uncertain timing or amount), contingent assets and contingent liabilities. All examples are located in the Implementation Guidance and have been updated to be more relevant to NPOs, including an example relating to onerous grant agreements.</p>		
	<p>References</p>	<p>Response</p>
<p>a) Do you agree that an illustrative example on warranties is removed from the Implementation Guidance, and a new example on onerous contracts is added? If not, why not?</p>	<p>Section 21, Illustrative example 3</p>	<p>Agree But no comment as can't find the example</p>



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Question 4: Revenue

INPAG Section 23 has been expanded to specifically cover revenue from grants and donations. It comprises two parts with a preface that contains content that is common to both.

Part I is new material that has been written specifically for NPOs that sets out the requirements for the recognition, measurement and disclosure of revenue from grants and donations. The timing of revenue recognition is dependent on the existence of an enforceable grant arrangement (EGA), which must have at least one enforceable grant obligation (EGO). It follows the concepts in the 5 step model for revenue recognition used in international standards. Part I also describes permitted exceptions for the recognition of gifts in-kind and services in-kind.

Part II reflects the *IFRS for SMEs* Accounting Standard material for contracts with customers provides. It provides simplified guidance for less complex contracts.

	References	Response
a) Section 23 Part I and Section 24 Part 1 introduce new terminology relating to grant arrangements ¹ . Do you agree with the terms enforceable grant arrangement and enforceable grant obligations and their definitions? If not, what alternative terms would you propose to achieve the	G23.23-G23.30, G24.3-G24.4	Agreed

¹ Both sections include the following question, which you can answer under either section, or cover the grantor and grantee perspectives separately.



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same meaning? What are the practical or other considerations arising from these definitions, if any?		
b) Do you agree with the structure of Section 23, with Part I focused on grants and donations, Part II focused on contracts with customers and a preface that brings together the key principles and information about how to navigate the guidance? If not, what changes would you make and why?	Section 23	Agreed
c) Do you agree that revenue is only deferred where the grant recipient has a present obligation in relation to the revenue received? If not, in what other circumstances could revenue be deferred and what is the conceptual basis for this proposal?	G23.27, G23.41-G23.59	Agreed
d) The revenue recognition model for enforceable grant arrangements requires that revenue is allocated where there is more than one enforceable grant obligation. Do you agree with the allocation methods identified? If not, what	G23.53-G23.56, G23.125- G23.138, AG23.52- AG23.59	Disagree Strongly disagree with this being a mandatory requirement of allocations. While funds are monitored this way, this is not aligned with a financial year necessarily and flexibility in these decisions around the grant are important to nonprofits.



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<p>methods would you propose? What are the practical considerations?</p>		<p>Grants straddle different financial years and the breathing room for nonprofits to be able to allocate or reallocate within parameters of a grant and its grant period (especially as parallel funding comes through throughout the life of the programme where multiple grants are supporting varying projects/programmes of a similar focus) and outside of the financial period, this can affect programme delivery.</p> <p>Similarly, core grant funding is often more flexible and tied up in terms of their allowance in creativity in using some funding for both core and programmes and this may only be decided closer to the end of the grant term which also may not be matched with financial year end. Forcing these decisions to be allocated and outlined in a public document at a premature stage in the grant, could restrict the creativity of the nonprofit in delivering on its mandate. Nonprofits already find themselves restricted and struggle to find coverage and this presents even further restrictions in an already challenging funding environment.</p> <p>In the context of South Africa, this creates an enormous administrative burden on an already strained sector with scarce financial human resources around financial reporting. This should be at the discretion of the non-profit as to what works best for them, or a gradual organic transition but not something that is mandatory. Non-profits need to be dynamic, responsive and not static and feel this can become very restrictive with premature detailed allocations closing any wiggle room within a grant cycle. The accountability around allocation lays between the nonprofit and the contracted grantmaker and grant agreement.</p>
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		<p>We agree only if this is a high level allocation i.e. grant amount revenue recognition but not a forced line by line allocation that constrains the organisation in how it can effectively manage finances and financial sustainability and its own resilience to be able to continue to carry out its mission.</p> <p>The allocation method should be voluntary.</p>
e) Do you agree with the permitted exceptions that allow the recognition of some gifts in-kind, either when sold, used or distributed, and that these permitted exceptions cannot be used where donations are received as part of an enforceable grant arrangement? If not, what would you propose instead and what is the rationale?	G23.36, G23.37	Yes
f) Do you agree that services in-kind are not required to be recognised unless they are mission critical? If not, on what basis should services in-kind be recognised and what is the rationale?	G23.36, G23.38, G23.63, AG23.35-AG23.36	Yes, should not be required unless mission critical, but this decision can also become subjective in terms of what is and isn't seen as critical to a mission.
g) Do you agree that donations in-kind (both gifts in-kind and services in-kind) should be measured at fair value? If not, what would you proposed instead?	G23.31-G23.32, G23.35-G23.38	Agreed Consideration: This could become subjective if there are varying levels of qualified services



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		<p>Worry that some financial pictures could be skewed and over inflated on the income side thus over inflating perceived surpluses.</p> <p>In SA Public Benefit Organisations cannot issue tax exempt certificates for services in kind also I believe partly for this reason.</p>
<p>h) Do you agree that administrative tasks are generally not separate individually enforceable obligations, but a means to identify or report on resources in an enforceable grant arrangement? If not, provide examples of where administrative tasks are an enforceable obligation.</p>	G23.49	<p>This may not always be the case-where you have an infrastructure service organisation that also provides capacity building around these functions and/or there are cross functional services being offered.</p>
<p>i) Do the proposals for disclosure of grant revenue provide an appropriate level of transparency? If not, what would you propose and what is the rationale for your proposal?</p>	G23.61-G23.70	<p>Agreed</p>
<p>j) Part I is written for simpler grant arrangements and Part II includes a paragraph for simpler contracts with customers. For more complex grant arrangements, additional guidance is provided about how to apply Part II in the NPO context. Do these proposals</p>	G23.42-G23.59, G23.73, AG23.37-AG23.40, AG23.62	<p>Not enough time to research and respond to this.</p> <p>Main concern is the complex and detailed allocation process within the statements as addressed in Question 4d</p>



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successfully remove duplication, help understandability and the ability to implement? If not, what would you change and why?		
k) Do you have any other comments on the proposals in Section 23, including whether the full content of the IFRS for SMEs section on revenue from contracts with customers in Part II is necessary for NPOs? If so, provide the rationale for the comment and cross reference to the relevant paragraphs.		Not able to respond

Question 5: Expenses on grants and donations		
<p>INPAG Section 24 is new and covers accounting for expenses. Part 1 of this Section covers Expenses on grants and donations. Guidance covers the recognition, measurement and disclosure of grants that an NPO makes to other entities or individuals. As with Section 23 Part I, it has a model for recognising expenses on grants and donations that depends on the existence of an EGA.</p>		
	References	Response
a) Section 24 Part I and Section 23 Part 1 introduce new terminology relating to	G24.3-G24.4, G23.23-G23.30,	Not sure May want to consider in accounting terms 'enforceable' makes sense in terms of the legal obligations, and while there is some detail around mutual obligations between



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<p>grant arrangements². Do you agree with the terms enforceable grant arrangement and enforceable grant obligations and their definitions? If not, what alternative terms would you propose to achieve the same meaning? What are the practical or other considerations arising from these definitions, if any?</p>		<p>both grantor and grantee detailed here, there is much conversation around 'shifting power'and 'decolonising philanthropy' and the term "enforceable" may perceptively lean towards an antiquated and unhelpful power dynamic between grantor and grantee who are infact meeting mutual mandates and missions as shared partners.</p> <p>It is understandable why it is used in an accounting context, but there is much qualitative work being down to shift this narrative, and in as much as the INPAG IFRS4NPO's project is seeking to be more reflective and effective of the NPO financial story representation, it is important to also be sensitive about the nature of philanthropy and beneficiary relationships in which these various NPO's operate in. Another word? Not sure... "Obligatory Grant Arrangement?"</p>
<p>b) Do you agree that all expenses on grants and donations can be classified as an enforceable grant arrangement or as an other funding arrangement? If not, provide examples of which expenses on grants or donations would not fit in either of these classes, and why not?</p>	<p>G24.3-G24.6</p>	<p>Agreed</p>
<p>c) Enforceable grant arrangements are required to be enforceable through legal or equivalent means. Do you agree that regulatory oversight and customary</p>	<p>G24.3, AG24.9, AG24.13-AG24.15</p>	<p>No Not with already closing civic spaces throughout Africa NPO Human Rights organisations are involved with advocacy around legislation and increasing imposed restrictions.</p>

² Both sections include the following question, which you can answer under either section, or cover the grantor and grantee perspectives separately.



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<p>practices can be sufficient to create an enforceable grant arrangement? If not, why not? What weight should be applied to these mechanisms?</p>		<p>In many cases NPO's are holding government to account. The environment is not conclusive to this kind of (often unethical and corrupt) big brother initiatives. These are the democratic spaces we are continuing to fight to keep open for human rights causes.</p>
<p>d) Do you agree that the full amount of the grant (including where it covers multiple years) should be recognised as an expense if the grant-provider has no realistic means to avoid the expense? If not, under what circumstances should a grant-provider not recognise the full expense and what is the rationale?</p>	<p>G24.17-G24.18, AG24.24-AG24.27</p>	<p>No</p> <p>Although a contract is in place, grants can be cancelled for various reasons; lack of delivery, change of and confidence in leadership, misalignment in ethos, failure or massive delay to pay (with certain government grant contracts).</p> <p>The environment is unpredictable even despite a signed contract.</p>
<p>e) Do you agree that grants for capital purposes are expensed by the grantor using the same principles as other grants? If not, why not? What would you propose instead?</p>	<p>AG24.30-AG24.35</p>	<p>Yes,</p> <p>But not sure in the case of the purchase of a building/office which could possibly skew the financial income statement into massive deficit? Not sure of implications and perhaps not qualified enough to respond. May be an issue for nonprofits that transition to these new reporting requirements in the year of transition.</p>
<p>f) Do the proposals for disclosure of grant expenses, which include a sensitive information exemption, provide an appropriate level of transparency? If not, what would you propose and what is the rationale for your proposal?</p>	<p>G24.32-G24.41</p>	<p>Agreed, Yes</p> <p>Sensitive information exemption is a requirement especially for those NPO's dealing in crime, corruption, fraud and need to maintain a fair degree of confidentiality for safety, security and effectiveness.</p>



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g) Do you agree that a grant-providing NPO with an OFA can only recognise an asset at the point that a grant recipient has not complied with a constraint on the use of funds provided? If not, what would you propose instead?	G24.11	--
h) Do you have any other comments on the proposals in Section 24, including that administrative tasks in an enforceable grant arrangement are generally not an enforceable grant obligation but a means to identify or report on resources. If so, provide the rationale for any comments and cross reference to the relevant paragraph.	Section 24 IG24.21	Administrative tasks can be a part of an enforceable grant obligation; certain governance structures, extra audits required by the grant, legal expenses etc. This is admin is not straightforward and depends on the nature of the work and grant.

Question 6: Borrowing costs		
INPAG Section 25 specifies the accounting for borrowing costs. There are no significant changes with modifications made to align with other sections.		
	References	Response
a) Do you agree that there are no significant alignment changes required to Section 25, other than the terminology changes	Section 25	Agreed Welcome the terminology changes



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that have been made? If not, set out the alignment changes you believe are required.		
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Question 7: Share-based payments		
INPAG Section 26 specifies the accounting for share-based payments. As share-based payment transactions are considered highly unlikely for NPOs this section has been removed and a paragraph included to explain why it is not part of INPAG.		
	References	Responses
a) Given the characteristics of NPOs, do you agree that guidance on share-based payments is not required? If not, provide examples of share-based payments and explain how they are used.	Not applicable	Agree

Question 8: Employee benefits		
INPAG Section 28 covers all forms of consideration given by an employing NPO to its employees. Changes have been made to this Section to remove references to share-based payments and to profit-sharing arrangements as these are not expected to be part of NPO remunerations structures. Amendments describe how a controlling NPO providing benefits to employees of controlled entities in the group can apply its provisions.		
	References	Responses



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<p>a) Do you agree that profit sharing and share-based payments are removed from Section 28 <i>Employee benefits</i> to reflect that employees of NPOs are very unlikely to be incentivised by sharing in the surpluses made by an NPO? If not, provide examples of such arrangements used by NPOs.</p>	<p>G28.3, G28.27</p>	<p>Agree</p> <p>An example in future may be: With squeezed funding the need for more income generation entrepreneurial models needing to be adapted putting additional strain on npo staff. Some boards may choose to recognize additional efforts around financial sustainability linked to income generation efforts through financial reward or bonus.</p>
<p>b) Do you agree that in-year changes to the value of post-employment benefits can be shown on either the Statement of Income and Expenses or Statement of Changes in Net Assets? If not, why not?</p>	<p>G28.21</p>	<p>Agree but don't know enough about this to comment</p>

<p>Question 9: Income tax</p>		
<p>INPAG Section 29 addresses the accounting for income tax including current and deferred tax. Minor editorial amendments have been made to align with other Sections. Amendments include the removal of the exclusion relating to government grants as this is now replaced, and to allow the tax expenses to be shown in the Statement of Income and Expenses or Statement of Changes in Net Assets as appropriate.</p>		
	<p>References</p>	<p>Responses</p>
<p>a) Are there any elements of Section 29 <i>Income taxes</i> that are not required by</p>	<p>Section 29</p>	<p>Yes This needs to be applicable to various tax legislation in respective countries and may not translate adequately.</p>



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<p>NPOs? If so, explain which elements are not needed and why.</p>		<p>For example in SA, certain income tax obligations are only required 11 months into the new financial year and calculated throughout this time period, so by the time the financials are closed, these obligations would have been settled a month prior and so miss the financial year end (not sure if the way I put it is making sense). For value added taxes etc that fall outside of income tax exemptions yes, this applies.</p>
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<p>Question 10: Foreign currency translation</p>		
<p>INPAG Section 30 describes how to include foreign currency transactions and foreign operations in the financial statements. This Section has been amended to require that the exchange rate gains or losses on monetary items are presented consistently with the transaction to which they relate.</p>		
<p>This Section also requires that deficits or surpluses arising as a consequence of changes in exchange rates for grant arrangements that are included as part of funds with restrictions are disclosed. This is to provide transparency of exchange rate exposures relating to grant arrangements.</p>		
	<p>References</p>	<p>Response</p>
<p>a) Do you agree that grants and donations should be considered when setting the functional currency? If not, why not?</p>	<p>G30.3 (c), G30.5 (b), G30.5 (d)</p>	<p>Agreed</p>
<p>b) Do you agree with the principle that exchange gains and losses are shown as part of funds without restrictions unless they relate to a transaction that is to be shown as restricted? If not, why not?</p>	<p>G30.12, G30.20 (c)</p>	<p>Agreed</p>



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c) Do you agree with the proposal to require exchange gains and losses that contribute to a surplus or deficit on grant arrangements presented as funds with restrictions to be disclosed? If not, why not? What would you propose instead?	G30.30	<p>No. Financials are reported in local currencies and the income would include the exchange rate amount. Whether it is a gain/loss and/or a surplus to the organisation as per the arrangement with the grantor is something that is settled between the grantor and the grantee.</p> <p>However, it is understood that for larger nonprofits with multiple currencies and large transactions where this has a material influence, this could be important.</p>
d) Do you have any other comments on Section 30, including whether there are any NPO-specific recognition and measurement issues associated with foreign currency translation? If so, explain your comments and the NPO-specific recognition and measurement issues.	Section 30	--

Question 11: Hyperinflation

INPAG Section 31 describes the requirements where an NPO is operating in a hyperinflationary economy. Minor editorial changes, including those relating to the structure and names of the financial statements have been made.

	References	Responses
a) Do you agree that there are no significant alignment changes required to Section 31, other than the terminology changes	Section 31	<p>N/A</p> <p>Don't feel qualified to respond in particular to those that are experiencing hyper inflation but can see that this section becomes subjective and up to the entity.</p>



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that have already been made? If not, describe any further alignment changes required.		We welcome the more relevant terminology
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Question 12: Events after the end of the reporting period		
INPAG Section 32 sets out the principles for recognising, measuring and disclosing events that happen after the end of the reporting period. Minor amendments have been made to include grant providers as a source of bankruptcy, to remove some references including to profit sharing and dividends. Those with the power to amend the financial statements after they have been issued has also been widened given the nature of NPOs.		
	References	Responses
a) Do you agree that there are no significant changes required to Section 32, other than those that have already been made for alignment purposes? If not, describe any further alignment changes required.	Section 32	Agreed We welcome the more relevant terminology

General Feedback	
Please share any other comments that you wish to raise on Exposure Draft 2. When providing additional feedback please reference the paragraph numbers, where possible and provide a short explanation to support your comments.	<p>For some nonprofits that are not required to abide by IFRS, should this standardization become the gold standard, it will have an enormous effect on these various nonprofits. While their national legislations may not require this format of reporting, international donors may. That should be considered somewhere in the adoption of these standards and the messaging campaign with donors.</p> <p>For those that already abide by IFRS, then many of these measures are useful.</p>



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