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STAKEHOLDERS' PERCEPTIONS ABOUT THE FIRST REVIEW OF IFRS FOR SMES STANDARD

Given the importance of small and medium enterprises at the national level by their essential role in the economy and the time passed since the issuance of the IFRS for SMEs standard it is still unclear what is the amount of financial information that users of SMEs need and which are the most useful informations for them. The aim of this research is to conduct a qualitative analysis regarding the answers received on the comment letters submitted to the first Comprehensive Review of the IFRS for SMEs 2012 and to show the significant contributions made by respondents on future recommendations for the development and review of the standard. The purpose is to study respondents' comments received on the Request for Information and the extent to which these comments are valuable to future agenda of the standard. At the same time, the content analysis shows us what is the interest of the respondents regarding the modification of the standard in order to best fit the national context.

Keywords: IFRS for SMEs, Content analysis, Comment letters.

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IFRS for SMEs is a standard organised by topics, which compared with full IFRS and many other national regulations, is a less complex standard. The most important simplifications compared with full IFRS are the omission of some topics that are not relevant to SMEs, fewer disclosures required and many recognition and measurement principles simplified.

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Introduction. Although more than a decade has passed since the issuance of the IFRS for SMEs and given the economic importance of SMEs at the national level, through their essential role in job creation and in the economy [1; 2], it is still unclear what is the amount of financial information that users of SME need and what would be the most useful elements for them. This is also supported by [3], who points out that the lack of stakeholder participation in the process for the standard-setting has been a problem for both, IASB and national accounting authorities, whose participation in the development of a separate framework for SMEs is considered crucial [1; 3].

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concerns, in particular about future information needs that may become important in some cases, such as financial crisis. The most important elements of the financial statements useful to users are considered to be income, profit, capital, debt and cash flow statement, which can predict liquidity, future profitability and evaluate the success of management in cash management [4].

The issuance of the standard has opened up new opportunities for the IASB to collaborate with national regulatory authorities, as SMEs following only local standards are unaware and unfamiliar with IFRS requirements. Therefore, collaboration is inevitable, especially in the first years of application where most problems and questions related to the application can occur. The problems that may arise may refer to the scope, insufficient guidance but also to the ambiguity of the requirements that may have unintended consequences.

Despite the fact that IFRS for SMEs has already been published, the research tries to examine the process of consulting the revision of the standard, focusing on the Request for Information (RFI) published as part of the Comprehensive Review of the IFRS for SMEs Standard (2012 Review) to get insights about the perceptions of the stakeholders, like professional bodies, national standard-setters, regulators and all other interested parties (accounting and auditing firms, analysts, consultant and preparers of financial statement). This RFI asked whether the scope requirements of the standard, are too restrictive being the first step on the initial comprehensive review by seeking the perceptions about the application of the IFRS for SMEs and about usage financial information prepared following it [5].

The aim of this paper is to conduct a qualitative analysis regarding the answers to the Request for Information by studying them and showing the significant contributions made by respondents on future recommendations for the development and revision of the standard.

Literature review. Content analysis is "a research method that uses a set of procedures to make inferences from text" [6] and also like "a method of codifying text into various categories and can be used where a great amount of qualitative information needs to be analyzed" [7]. This method is used to highlight the impact of comment letters on the standard setting development [8], [9], in accounting research mostly to analyze corporate communications [8; 10–12].

The content analysis method was used by [12] in their study regarding the FASB's 1996 exposure draft related to reporting comprehensive income. Their results showed what types of arguments are included in the comment letters and whether the arguments are connected with the affiliation of the writers [12]. Also, they have grouped the respondents into categories like academics, insurance, banks, industry, public accountants, and other.

Research methodology. IASB's purposes in the development of IFRS for SMEs included the provision of high quality, intelligible, globally accepted standards and executors that enabled participants in different capital markets and other users to be able to make economic decisions [13]. The main differences indicated by [14] between SMEs and large responsible public entities subject to full IFRS are users information needs of the entity's financial statements, the extent and the depth of the accounting expertise reachable by the entity, and the capacity to support all the costs of applying the same standards as the large responsible public entities [14]. The interest of the users of SMEs' financial statements is

reduced for some information contained in financial statements prepared under IFRS.

The content analysis offers important advantages in collecting information that later can be quantified and afterwards put through to various statistical tests, while being a less time-consuming method than other, such as questionnaires [15; 16]. Further, this method can be described as a "research method that uses a set of procedures to make valid inferences from the text. These inferences are about the sender(s) of the message, the message itself, or the audience of the message" [17].

In general, in content analysis method are used two types of approaches, a quantitative one, form-oriented analysis (with focus on the word count), typically answering the question "how many" and a qualitative one, meaning-oriented analysis, enabling interpretation of the text (with focus on the meaning behind the words) [12; 18]. Although, the approach that we will use is characterized as qualitative one, providing insight from the text analysis and given the presence of subjectivity in the analysis.

To understand better the research, this section will provide the presentation of the methodology that we will use. The purpose is to conduct a qualitative analysis by studying the comment letters received by the IASB and to show the substantial contributions made by respondents on future recommendations for the development and review of the standard.

In order to achieve the main goal of this research we have defined the following research questions:

RQ1: Do respondents agree with the scope requirements of the IFRS for SMEs?

RQ2: What are the arguments included in the comment letters if they do not agree with it?

RQ3: What are the general issues they may have relating to changes that may occur to the IFRS for SMEs?

Data collection and analysis

The Request for Information was divided into two parts: Part A with specific questions on particular sections of the IFRS for SMEs and Part B with general questions about the standard. The IASB received 89 comment letters on RFI, but our sample contains only 87 comment letters provided by the IASB on their website (www.ifrs.org).

For our analysis, we will use only the first three questions from Part A (S1 – Use by publicly traded entities, S2 – Use by financial institutions, S3 – Clarification of use by not-for-profit entities) and four questions from Part B (G1, G2, G3, G4,) [5]. The RFI questions have multiple choice answers ((a), (b), (c) for example), respondents being asked to choose the most appropriate option from their point of view, arguing their choice where they deem it necessary, giving certain additional information regarding their answers. To generate the database, we downloaded all the comment letters available as well as the Request for Information document. To analyse the Comprehensive Review of the IFRS for SMEs 2012 comment letters, we used traditional content analysis, developing a coding methodology. First, the letters were coded according to the demographic areas of respondent and the type of respondent. Next, the letters were coded according to the type of answers given for each question and the level of agreement (agreement with no changes or with recommended changes, disagreement).

All the comment letters were consulted and divided into several groups, origin locations of the respondents and stakeholder groups. Figure 1 shows a synthesis of the coding scheme for demographic areas of responses (origin regions of the respondents), with 9 attributes: Africa, Asia, Australia, Central America, Europe, Global Organisations, North America, Oceania and South America. As we can

see, Europe was the region with the most comment letters responses, followed by the Global Organisations like EFAA, ACCA, EFRAG etc. The attribute Global Organisations is used in the analysis for the situations when we have a comment letter from an organization

covering several demographic areas or several jurisdictions. Also, analysing the jurisdictions, the most interested country in answering to RFI was United Kingdom, because 13 comment letters were sent from different stakeholder groups.

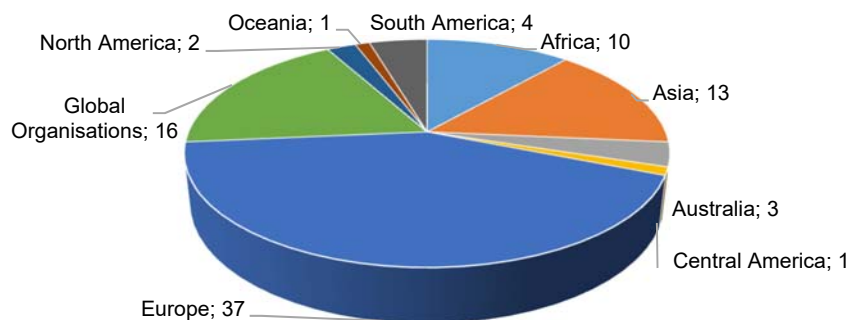


Fig. 1. Submissions categories by origin regions of the respondents (number of comment letters)

Source: Author analysis.

Figure 2 shows a synthesis of the coding scheme for stakeholder groups, with 5 attributes: Academics, Accounting and audit firms, Accounting Regulation Bodies, Professional organizations and Others. The attribute Professional organizations contain the national professional organizations like ICAEW, CPA Australia, ICAC or CECCAR and the global ones like ACCA, and as we can see, the majority of the comment letters were from

professional organizations (36 comment letters), followed by accounting regulation bodies (17 comment letters) and accounting and audit firms (13 comment letters). The interest of professional organisations is high because they deal with the development of the national process of national standardization working with governments and regulators, and also they deal with the educational process of the members.

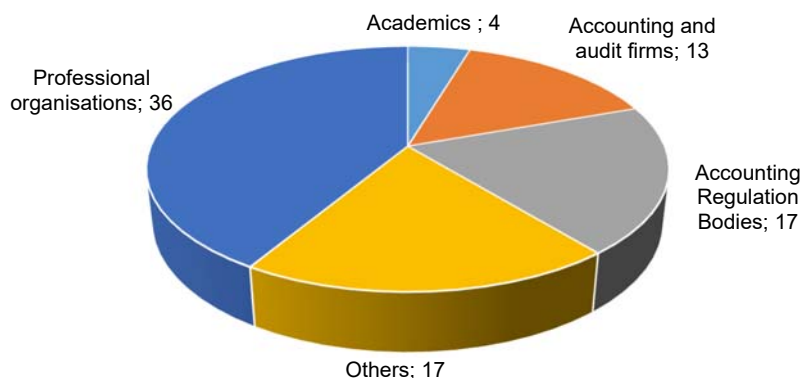


Fig. 2. Submissions categories by stakeholder groups (number of comment letters)

Source: Author analysis.

Analysis of Part A – specific questions on particular sections of the IFRS for SMEs

Table 1 provides a general overview of the answers submitted by the respondents. For S1 – "Are the scope requirements of the IFRS for SMEs currently too restrictive for publicly traded entities?", we identified the number of

respondents who agreed to keep the current requirements of the standard for publicly traded entities, the number of respondents who agreed to revise the scope of the standard, the number of respondents who made suggestions and comments concerning about that specific questions and the number of non-respondents.

Table 1. Answers to S1 (number of comment letters)

Question	To keep the current requirements	To revise the scope	Suggestions	Non-respondents	Total – comment letters
S1	49	11	14	13	87
	56 %	13 %	16 %	15 %	100 %
S1 – "Are the scope requirements of the IFRS for SMEs currently too restrictive for publicly traded entities?"[5]					

Source: Author analysis.

Approximately 56 % of the respondents to question S1 agreed that IASB should continue to forbid listed companies from using it. Their main argument was that the IFRS for SMEs was developed for entities that are not "public-interest entities" and for the users of their financial statements, who have less comprehensive needs. If the scope of the standard will be wider, including publicly traded entities, then IFRS for SMEs will be too difficult to understand and the original purpose of the standard will be compromised. Another argument was that they do not see the need to extend the scope, because the jurisdictions already can incorporate the standard into their local accounting rules if they decide to permit certain publicly traded entities to apply it. 13 % of the respondents agreed that IFRS for SMEs should revise the scope and permit to each jurisdiction to decide if IFRS for SMEs should be permitted or required and to determine it is appropriate or not to use it. If the scope is too restrictive then may cause difficulties for the adoption of the standard and in certain jurisdictions may be a conflict with local laws.

The respondents pointed out that it is more adequate that the local authorities decide how will apply the standard in

their jurisdiction. They agreed that IASB should not make decisions about which standard is applied in jurisdictions. 16% of the respondents chose the third option, suggesting that it would be beneficial for users to be informed through disclosures that the standard is not suitable for an entity. Also, they suggested that if IASB will remove the scope constraint for publicly-traded entities, they should help local authorities, providing guidance and assisting them in deciding if the use of IFRS for SMEs should be permitted or required for a certain entity.

Table 2 provides a general overview for S2 – "Are the scope requirements of the IFRS for SMEs currently too restrictive for financial institutions and similar entities?". Analysing the comment letters, we identified the number of respondents who agreed to keep the current requirements of the standard for financial institutions and similar entities, the number of respondents who agreed to revise the scope of the standard, the number of respondents who made suggestions and comments concerning about that specific questions and the number of non-respondents.

Table 2. Answers to S2 (number of comment letters)

Question	To keep the current requirements	To revise the scope	Suggestions	Non-respondents	Total – comment letters
S2	42	18	15	12	87
	48 %	21 %	17 %	14 %	100 %
S2 – "Are the scope requirements of the IFRS for SMEs currently too restrictive for financial institutions and similar entities?" [5]					

Source: Author analysis.

After the analysis of the comment letters, 48 % of the respondents to S2 agreed that IASB should continue to forbid to financial institutions and similar entities from using the IFRS for SMEs. It is considered that an entity is publicly accountable and it should apply full IFRS if it holds funds for a broad group of outsiders as one of its primary businesses [5], because of the important role of the financial institutions in the economic system. In this kind of entity is a significant public interest so it is responsible to deliver high-quality financial statements by addressing the needs of their users [5]. The importance of financial information for financial institutions's stakeholders is critical, so the respondents cannot support an approach that will permit financial institutions to use a simplified accounting standard, like IFRS for SMEs. They believed that the standard is not adequate for financial institutions without compromising the objective of financial reporting. If the scope of the standard will be wider, including financial institutions and similar entities, then IFRS for SMEs will be too difficult to be applied by SMEs and its primary aim of developing a standard more simplified for small and medium-sized entities will be undermined.

Given the fact that the nature and complexity of financial institutions and similar entities around the world are different, 21 % of the respondents considered that IASB should review the scope of the standard, giving the right to each jurisdiction to decide if the entities mentioned above should be applying the standard mandatory or

voluntary. Local authorities may consider that is enough for the users if local regulatory requirements are satisfied or they may consider that sufficient information is provided by the usage of the standard for accountability purposes. 17% of the respondents believed that is better to clarify the type of entity for which the IFRS for SMEs is designed, to provide a clearer frame of orientations for decisions on whether changes to the IFRS for SMEs are needed for such entities. Also, they suggested to clarify definition of "public accountability" by integrating the explanation of "traded in a public market".

Table 3 provides a general overview for S3 – "Should the IFRS for SMEs be revised to clarify whether an NFP entity is eligible to use it?". We identified the number of respondents who agreed to revise the scope of the standard to clear up whether an NFP entity is eligible to use IFRS for SMEs. The IASB offered two types of answers for the agreement about the revision, by clarifying if (a) soliciting and accepting contributions does not automatically make an NFP entity publicly accountable and (b) soliciting and accepting contributions will automatically make an NFP entity publicly accountable [5]. We identified also the number of respondents who agreed to keep the current requirements of the standard, the number of respondents who did not agreed with the multiple choices mentioned above, provided by IASB and the number of non-respondents.

Table 3. Answers to S3 (number of comment letters)

Question	To revise the scope (a)	To revise the scope(b)	To keep the current requirements	Suggestions	Non-respondents	Total – comment letters
S3	34	2	23	15	13	87
	39 %	2 %	26 %	17 %	15 %	100 %
S3 – "Should the IFRS for SMEs be revised to clarify whether an NFP entity is eligible to use it?" [5]						

Source: Author analysis.

According to our results, 39 % of the respondents to S3 agreed that IASB should revise the scope, clarifying that asking for and receiving donations does not automatically make not-for-profit (NFP) entity publicly accountable. They supported their choice mentioning that IASB's intention is not to transform NFP entities into entities publicly accountable. Additionally, they pointed out the IFRS for SMEs does not refer to specific problems for NFP entities does this not involve that it is unfit for them, but providing guidance it will help to avoid unintended misuse by entities. Only 2 % of the respondents agreed that IASB should revise the scope, clarifying that asking for and receiving donations will make an NFP entity publicly accountable. NFP entities accept public contributions, their level of accountability is high and they have to deliver high-quality financial statements to satisfy the needs of information of their donors and beneficiaries by applying full IFRS. 26 % of the respondents agreed that IFRS for SMEs should not review the scope for this problem because the applicability of the standard to NFP entities should not be a part of the standard review. The main reason was that the unique needs of not-for-profit entities and of the users of their financial statements cannot be

covered by IFRS for SMEs. Therefore, incorporating guidance and disclosure requirements for specific issues for NFP entities, the standard would be too complex, deviating from his original aim, a simplified standard for SMEs. Approximately 17% of the respondents made suggestions about other type of clarifications, namely IASB should clearly express that the standard is not suitable for NFP entities and also take into considerations to develop a different accounting standard for this type of entities, because NFP entities are not suitable for the definition of public accountability.

Analysis of Part B -general questions about the IFRS for SMEs.

Table 4 provides a general overview for G1 about consideration of minor improvements to full IFRS, because there are opinions about natural incorporations of the changes in the IFRS for SMEs to improve requirements. For this question, IASB provided four answer options with reference to changes that should be integrated into the standard, changes that should not be integrated into the IFRS for SMEs, criteria for determining how any changes should be integrated and other recommendations that could be made [5].

Table 4. Answers to G1 (number of comment letters)

Question	Changes should be integrated in the IFRS for SMEs	Changes should not be integrated in the IFRS for SMEs	Criteria for determining how any changes should be integrated	Suggestions	Non-respondents	Total – comment letters
G1	28	15	10	11	23	87
	32 %	17 %	12 %	13 %	26 %	100 %
G1 – "How should the IASB deal with such minor improvements, where the IFRS for SMEs is based on old wording from full IFRSs?" [5]						

Source: Author analysis.

Analysing the answers, 32 % of the respondents believe that IFRS for SMEs should incorporate changes when they intended to improve requirements. Those changes should be taken into consideration for incorporation after they approved them under full IFRS and they have won some experience about implementation. In this case, would be a delay between the adoption under full IFRS and the adoption under the IFRS for SMEs. The respondents suggested that a period of three years will be suitable, because a long period will avoid from losing validity, especially by the difficulty of updating the regulations.

Instead, approximately 17 % of the respondents consider that IFRS for SMEs should not incorporate changes, because IFRS for SMEs is a standalone standard and a simplified version of full IFRS and all changes should be incorporated individually considering the needs of users of small and medium sized entities

financial statements [5] and to reinforce its status as a separate reporting standard from full IFRS.

Only 12 % of the respondents agreed that the board should elaborate criteria for establishing how that IFRS for SMEs should incorporate any changes that may arise. The existence of the established criteria will help to clarify the objective of the standard and will provide a solid approach to standard updates. At the same time, the relationship between the two standards will be clarified, allowing the planning of changes in a more efficient way. The others 13% of the respondents suggested that if the changes will affect the financial reporting of most SMEs, then they should be incorporated, if not it will be only an unnecessary weight for SMEs, who will need time to adapt to the new requirements. The standard should only reflect minor changes in full IFRS if there is an obvious problem for SMEs.

Table 5 provides a general overview of the questions G2 and G3 about the SME Implementation Group Q&As program. The Q&As provide non-mandatory and relevant guidance on specific accounting questions that are being raised by users implementing the IFRS for SMEs. The purpose of these questions is to develop

recommendations about the manner how the Q&As program should be proceeded and how the current program should be handled through the review process. The responses have been categorized as agreements, disagreements, and suggestions.

Table 5. Answers to G2 and G3 (number of comment letters)

Question	Agreement	Disagreement	Suggestions	Non-respondents	Total – comment letters
G2	37	14	11	25	87
	43 %	16 %	13 %	28 %	100 %
G3	27	11	21	28	87
	31 %	13 %	24 %	32 %	100 %
G2 – "Do you believe that the current, limited programme for developing Q&As should continue after this comprehensive review is completed?" [5]					
G3 – "Should the Q&As be incorporated into the IFRS for SMEs?" [5]					

Source: Author analysis.

IASB received only 62 answers for question G2. Approximately 43% agreed that the Q&As program should proceed after the comprehensive review is completed because Q&As are not mandatory and the guidelines received from them are helpful for the development of the standard. And also because for small organisations and jurisdictions with limited accounting resources, the additional guidance is are very useful. 16% disagreed and believe that Q&As process should not be continued. The main reason was that Q&As program is dealing with application questions that arise in the first years of the projects. After that will no longer be needed because new problems can be handled by future updates of the standard or in the training materials provided.

The suggestions received as answers at question G2 show that the period for responses should increase (minimum 60 days) to allow international respondents, who are non-english speakers to have sufficient time to respond. The same request came also from organizations because they need more time to receive feedback from their members. The SMEIG should consider to publish a newsletter with the most useful responses, because of the lack of professional accounting staff from SMEs it would be more useful if guidance will be provided in an informal way. Some of them believe that Q&As programme is time-consuming, too formal and inflexible being the only manner for responding to issues and also the programme should address issues only that are related to IFRS for SMEs, excluding full IFRS from the questions.

For question G3, IASB received 59 answers and only 31% of them agreed that guidance from Q&As should be integrated in the revision process or in supporting materials. They see the incorporation like an advantage because will be easier if all the guidance will be in one place, keeping the standard comprehensive but still standalone. They consider that the Q&As section would clarify the situations where exists unclear requirements. 13% of the respondents disagreed with the incorporation of Q&A, suggesting that is better to retain the program separately to ensure that the standard is kept as less complex as possible, being unnecessary to incorporate them because Q&As are only interpretations of simple problems. The rest of the respondents suggested that training materials should incorporate Q&As. Other opinions suggested that IFRS for SMEs should incorporate only

those Q&As that bring clarifications about its requirements, keeping the others as distinct guidance.

Answering to the last question G4 – "Do you have any comments on the IFRS Foundation's IFRS for SMEs training material available?" from the analysis, we see that the respondents considered that training materials are good, that IASB should include more illustrations in them and guidance on transaction flows to better understand the standard application rather than following pre-set examples, the illustrative financial statements should be more "comprehensive", because they do not contain examples of all the requirement from the standard. Likewise, the training tools are beneficial for users of IFRS for SMEs to have access to high quality training material for introductory purposes, as there is limited guidance in the standard as such.

The suggestions were that IASB should continue to retain and develop training materials, updating them for any current problems not sufficiently covered and for any changes coming from this review process. And that the board should place disclaimer wording in the training modules to inform the users of full IFRS not to use the training modules because they addressed the IFRS for SMEs adoption.

Conclusions. The purpose of issuing the RFI 2012 was to identify the elements that should be taken into account for the review of the IFRS for SMEs, like the notion of "public accountability" for entities that can use the standard and if the recent changes of IFRS should be incorporated into IFRS for SMEs. Due to the feedback received from stakeholders and after consulting the SMEIG, the IASB decided that the changes should be limited, as the standard was still new to many of them. After consulting the comment letters, the amendments proposed by the IASB in 2015 were strictly related to the clarification of the existing requirements and the addition of support guidance. These proposals aimed only to understand the existing requirements without changing in any way the financial reporting practices and the way of preparing the financial statements. Following the proposals received, the IASB decided that the revision of the standard should be done periodically but not earlier than two years from the effective date of the previously revised version of the standard. Also, the IASB conclusion was that IFRS for SMEs is working well in practice.

Unlike other requests for information, the IASB expected to receive a small number of responses, as the category of users of SMEs' financial statements is more restricted than publicly traded companies. For this reason, in order to supplement the opinions received from the interested parties, a Staff consultation was carried out.

However, the high response rate to the proposed questions shows the interest of stakeholders in the development of the standard and its suitability to the business environment. Therefore, following the analysis, the development of the standard is a point of interest for professional organizations, accounting regulations bodies and accounting and audit firms. In addition, most respondents argued the answer, whether it requires argumentation or not, providing additional explanations for the choice made. This could be observed in the case of disagreement responses, because the respondents provided valid arguments for the chosen option, the feedback received thus becoming even more valuable.

Discussion. IFRS for SMEs is a standard organised by topics, which compared with full IFRS and many other national regulations, is a less complex standard. The most important simplifications compared with full IFRS are the omission of some topics that are not relevant to SMEs, fewer disclosures required and many recognition and measurement principles simplified. The users' needs of financial statements could be met by less complex reports that provide information on an entity's liquidity, profitability, and solvency. The main need to be met is the comparative analysis of performance over time, to predict expected returns, cash flows, future funding and to be able to control management. But there are concerns, in particular about future information needs that may become important in some cases, such as financial crisis. The most important elements of the financial statements useful to users are considered to be income, profit, capital, debt and cash flow statement, which can predict liquidity, future profitability and evaluate the success of management in cash management.

The issuance of the standard has opened up new opportunities for the IASB to collaborate with national regulatory authorities, as SMEs following only local standards are unaware and unfamiliar with IFRS requirements. Therefore, collaboration is inevitable, especially in the first years of application where most problems and questions related to the application can occur. The problems that may arise may refer to the scope, insufficient guidance but also to the ambiguity of the requirements that may have unintended consequences.

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