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A study of stakeholder groups' preferences for progressive public administration or new public management in public sector accountancy

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In partial fulfilment of the requirements for the degree of Master of Commerce (Accounting), University of the Witwatersrand

Ethical clearance no. CACCN/1094

Declaration

I hereby declare that this research report is my own unaided work. It is submitted in partial fulfilment of the degree of Master of Commerce by Coursework and Research Report at the University of the Witwatersrand, Johannesburg. It has not been submitted elsewhere for the purpose of being awarded another degree or for examination purposes at any other university.



Bruce Vivian

4 April 2016

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List of acronyms

CF	Conceptual Framework
CIPFA	Chartered Institute of Public Finance and Accountancy (United Kingdom)
Cour des Comptes	Court of Audit (France)
CP1	Phase One Consultation Paper
CP2	Phase Two Consultation Paper
ED1	Phase One Exposure Draft
ED2	Phase Two Exposure Draft
GBE	Government Business Entities
GPFRs	General Purpose Financial Reports
Hong Kong SAR	Hong Kong Special Administrative Region of China
HoTARAC	Australian Heads of Treasuries Accounting and Reporting Advisory Committee
IASB	The International Accounting Standards Board
IAASB	The International Auditing and Assurance Standards Board
ICGFM	The International Consortium of Governmental Financial Management
IMF	The International Monetary Fund
IPSAS	International Public Sector Accounting Standards
IPSASB	The International Public Sector Accounting Standards Board
MfC	Specific Matter for Comment
NPM	New Public Management
PPA	Progressive Public Administration
PSAB	Public Sector Accounting Board (Canada)
PV	Preliminary View
SAI	Supreme Audit Institution
SPN	Scoring Plan criteria Number (refer to Appendix A)
UK	United Kingdom
UN	United Nations

Abstract

The success of public sector accountancy reform as part of the 'new public management' is dependent on the common goals of all stakeholders. This research applies new institutionalism to understand the isomorphic pressures being exerted by accounting professionals and international organisations on government agencies to drive these reforms. It analyses the preferences of different stakeholder groups to the opposing doctrines of new public management and progressive public administration. These preferences were analysed through a content analysis of the comments letters submitted to the IPSASB during their recent conceptual framework project.

Accounting professionals were found to be motivated by normative and mimetic isomorphism to bring about institutional change under the themes of private sector mimicry, inter-generational equity and performance focused reporting. They were strongly motivated to lobby for these changes by their own self-interest. Government agencies showed a resistance to these changes. Their self-interest reduced the level to which they were influenced by isomorphic pressures. Such resistance was strongest in Canada but weakest in Australia and the United Kingdom. No conclusions could be reached on the role of international organisations in supporting institutional change.

Chapter I – Introduction

The adoption of accrual accounting by public sectors is considered by many to be a controversial but critical element of public sector reforms that form part of the ideology know as New Public Management (NPM) (Humphrey & Miller, 2012). For many, accrual accounting has been adopted on the unsubstantiated assumption that it is better than its cash accounting alternative (Guthrie, 1998; Lapsley, Mussari, & Paulsson, 2009). Some have gone as far as to suggest that accounting professionals may be driving this reform for their own benefit (Humphrey, Guthrie, Jones, & Olson, 2005). Similarly, international organisations, such as the United Nations and the European Commission, have adopted accrual accounting themselves and are placing pressure on public sectors to reform for the sake of international legitimatisation (Aggestam et al, 2013; Christiaens et al, 2010).

The International Public Sector Accounting Standards Board (IPSASB) has been at the forefront of developing a set of international accounting standards that support the application of accrual accounting in the public sector (Christiaens et al., 2010). It recently published a new conceptual framework (CF) to underpin its International Public Sector Accounting Standards (IPSAS) (IPSASB, 2014b). The literature suggests that accrual accounting is now widely acknowledged by governments as a necessary reform, but there are varying levels of its implementation and acceptance (Chan, 2003). The consultation process of the CF project provides an opportunity to analyse the level of preference of different public sector stakeholder groups to the implementation of NPM doctrines as against the Progressive Public Administration (PPA) doctrines of the twentieth century.

1.1 Statement of the problem

The success of public sector reform is dependent on the common goals of all key stakeholders (Cooper & Ogata, 2005). A dichotomy between the views of different stakeholders interested in general purpose financial reports (GPFRs) would threaten the effectiveness of such reform. If the adoption of accrual accounting, and in particular the IPSAS, is driven primarily by the self-interest of accounting professionals (Humphrey et al., 2005), it may not result in an effective solution for public sectors around the world. Similarly, a difference in the accounting views of international organisations and governments will place a limit on cross-national comparability of GPFRs (Christiaens et al., 2010).

This research applies the principles of new institutionalism (Adhikari, Kuruppu, & Matilal, 2013; DiMaggio & Powell, 1983) by understanding whether government agencies are resisting ongoing normative isomorphic pressures from accounting professionals and coercive isomorphic pressures from international organisations by lobbying through the IPSASB CF project's consultation process. The consultation process of the CF provides data in the form of comment letters that can provide evidence of the views of the different stakeholder groups and the level of polarisation existing between these groups. As such, the purpose of this research is to compare the alignment of government agencies, professional accountants and international organisations respectively to the doctrines of NPM as evidenced in the comment letters.

The research problem is addressed by testing the following hypotheses:

H1: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.

H2: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.

The association with NPM is assessed under the themes of (1) private sector mimicry; (2) asset recognition; (3) inter-generational equity; (4) whole-of-government reporting; and (5) performance focused reporting (see Section 2.3). It will be evaluated based on the evidence of the isomorphic pressures described in Section 2.4.

1.2 Purpose and significance

Accounting has the potential to direct the attention of users of financial statement to particular matters (Hopwood, 1984; 1994). The goal of this study was to refine the current understanding of the differences in the level of preference existing between key stakeholder groups within public sectors around the world with respect to the role of accountancy. It clarifies whether there is a stronger push from the accounting professional community and international organisations towards NPM-influenced accounting standards than there is from government agencies.

The study is considered significant because it fulfils the ongoing need to conduct more cross-national research on NPM (Humphrey & Miller, 2012) and, in particular, the role of international accounting standards in the public sector. It provides an indication of the level of consensus between stakeholders on key issues in the IPSASB CF and the resulting expectation of its perceived legitimacy in public sectors around the world. It provides a cost-effective methodology by utilising written data available in the comment letters submitted to the IPSASB during their CF project.

1.3 Scope, delimitations and assumptions

The study is limited to phase one and two of the IPSASB CF project (the phases of the project are outlined in Section 2.1). It considers the content of comment letters on both the consultation paper and exposure draft for each phase. The reason for this limitation is to focus the study only on those core conceptual

accounting issues that can provide evidence of a preference in the stakeholder groups for either PPA or NPM. Incorporation into the study of phase three which deals with measurement would have been aligned to the theme of marketisation (Guthrie, 1998). It was excluded due to the complexities in measurement issues which would make it difficult to clearly align a view of a respondent to either PPA or NPM. Phase four on presentation was excluded because the specific matters for comment in the consultation documentation are very general and are unlikely to provide rich data showing explicit positions held by different user groups.

The study only provides data and conclusions on those public sector stakeholders that have contributed to the two chosen phases of the IPSASB CF process. It would be inappropriate to project the results to a broader population of stakeholders because they may be fundamentally opposed to the use of the IPSAS in public sector financial reporting and may have no interest in commenting and expressing their views.

The study focuses on the level of preference of stakeholders towards NPM or PPA. These two paradigms have been chosen because they are predominant in the literature and are specifically highlighted in the two seminal NPM articles by Hood (1991, 1995). The relative strength of each paradigm has not been assessed. They are only used as opposing theoretical frameworks to identify the preferences of stakeholders.

There was a significantly large number of Canadian respondents as evidenced in Section 4.1.2. The researcher did not completely exclude these respondents. This allowed the researcher to analyse the results in totality. The results have been analysed both by including and excluding Canadian respondents. This approach allowed the researcher to understand the overall levels of preference internationally for NPM and PPA and the preferences expressed by non-Canadian respondents. The specific preferences of Canadian respondents are considered in the qualitative analysis.

It was assumed that comment letters received from organisations are indicative of the respective organisation's views.

1.4 Categorisation of respondents

Three respondents groups have been identified for the purpose of this study, being government agencies, accounting professionals and international organisations.

Government agencies are defined as government departments, agencies, institutions and entities, and supreme audit institutions (SAIs) that operate under the Napoleonic system (also referred to as the judicial or Court of Audit model). The inclusion of SAIs under the Napoleonic system is appropriate because staff at these SAIs typically have a legal background and focus their work on legal matters rather than issues of efficiency and effectiveness (Blume & Voigt, 2011; Stapenhurst & Titsworth, 2001). Such SAIs are expected to have a closer alignment to PPA (see Section 2.2).

Accounting professionals are defined as accounting firms, accounting professional organisations, local standard setters (provided they are not a government agency) and supreme audit institutions that operate under the Westminster system or the Collegiate system. The inclusions of SAIs under the Westminster and Collegiate system is appropriate because staff at these SAIs typically have a financial accounting background and are more likely to be represented by accounting professionals (Blume & Voigt, 2011; Stapenhurst & Titsworth, 2001).

International organisations are defined as organisations with membership from multiple countries that do not fall within the definition of accounting professionals.

Chapter II – Literature review

2.1 Public sector accounting and the IPSAS

The IPSASB, an independent standard setting board of the International Federation of Accountants, develops the IPSAS (IPSASB, n.d.-a). These standards are accrual-based and are used by various governments and other public sector entities across the globe (IPSASB, n.d.-a). In 2014, the IPSASB published its CF for General Purpose Financial Reporting by Public Sector Entities (IPSASB, 2014a). The CF project included a full consultation process where interested parties were invited to comment on a consultation paper and subsequent exposure draft for each of the project's four phases: 1) objectives, scope, qualitative characteristics and the reporting entity; 2) elements and recognition; 3) measurement of assets and liabilities; and 4) presentation (IPSASB, n.d.-b). There were many contentious issues which arose during this process (EY, 2014), and several of these issues will be developed in this literature review. These issues will be framed by two public management paradigms: PPA and NPM which are outlined in Section 2.2 (Hood, 1991, 1995).

2.2 From progressive public administration to the new public management

For the greater part of the twentieth century, the dominant public sector management doctrine was that of PPA (Groot & Budding, 2008; Hood, 1995). PPA developed under the idea that the public sector is fundamentally different to the private sector (Hood, 1995) and the independence of public servants from the political process (Miller, 1994). Elected officials dealt with the decision making on 'what needed to be done' leaving public servants to deal with the question of 'how it should be done' (Miller, 1994). A career in the public service was characterised by incremental pay increases and long-term job security (Gray & Jenkins, 1995). Accountability was to elected officials (Gray & Jenkins, 1995) and was focused on inputs

rather than outputs (Hood, 1995). Many procedural rules and controls were put in place to prevent corruption and abuse within the public service (Dunleavy & Hood, 1994; Hood, 1995). Financial accountability was driven by cash budgeting and reporting which provided evidence of the utilisation of money distributed to government agencies through annual appropriations (Christiaens & Rommel, 2008).

Critics of PPA highlight problems that include the monopoly held by government for the provision of basic services, inefficiencies in the use of resources and a lack of accountability for the outputs of public servants (Gray & Jenkins, 1995). In addition, the PPA model gave rise to overtly high trust amongst role players inside the public sector, but low trust between those within and those outside the public sector (Hood, 1995). This meant that public servants did not hold one another accountable for poor performance and were resistant to partnering with the private sector (Hood, 1995).

'New Public Management' was a term coined by Hood (1991) to describe an emerging trend of public sector reforms in developed nations during the 1970's and 1980's that attempted to address the weaknesses of PPA. Reforms associated with NPM were characterised by a drive towards increased efficiency (Ter Bogt, 2008) and accountability (Mayston, 1999). At the heart of ensuring accountability was the ideal of quantification (Hood, 1991). It provided a means for demonstrating achievements and holding public sector managers accountable (Lapsley, 1999). It was this push towards quantification that drove changes in public sector financial reporting (Lapsley, 1999). These changes have included the transition to accrual accounting from historically cash-based accounting (Guthrie, Olson, & Humphrey, 1999).

The move to accrual accounting has not been without its critics (Ellwood & Newberry, 2007; Wynne, 2008). There is little empirical evidence that the additional information that it provides is actually used by the users of financial statements in a public sector context (Arnaboldi & Lapsley, 2009; Christiaens & Rommel, 2008). The complexities of accrual accounting have resulted in a perceived loss of control for legislatures due to elected officials being unable to understand the reported information (Funnel, Cooper, & Lee, 2012) and an increased risk of manipulation of this information (Arnaboldi & Lapsley, 2009). Critics of accrual accounting note that a cash-based approach is conceptually closer to a public sector reality which

is driven by accountability for the spending of approved budgets (Christiaens & Rommel, 2008). Such thinking is closely aligned to a PPA approach (Hood, 1995).

NPM has begun to see its popularity in academic circles wain in favour of theories such as digital era governance, networked governance and public value management (Dunleavy, Margetts, Bastow, & Tinkler, 2006; O'Flynn, 2007; Stoker, 2006). Despite this, Dunleavy et al. (2006) note that one of the ongoing legacies of NPM is its influence on financial management and reporting, in particular the accrual basis of accounting. Consequently, despite the criticisms identified in this Section, it would seem that accrual accounting is here to stay (English, Guthrie, & Parker, 2005; Lapsley, 2008). The reasons for this will be discussed in Section 2.4. An important question is whether or not there is room for the continued influence of PPA ideas within the way accrual accounting is implemented. Chan (2003) shows accrual accounting can be implemented to varying extents, suggesting that certain stakeholder groups may be interested in lobbying for a less extreme version of accrual accounting. In Section 2.3, five themes will be explored which show evidence in favour of either PPA or NPM doctrines within the IPSASB CF comment letter process.

2.3 New public management themes

Various researchers have attempted to identify the key themes of NPM which describe the resulting accounting practices (see Guthrie et al., 1999; Hood, 1991, 1995; Humphrey et al., 2005; Lapsley, 1999; O'Flynn, 2007). For purposes of this research, five themes have been identified which are relevant for an analysis of CF comment letters: 1) private sector mimicry (Hood, 1991); 2) asset recognition (Heald & Dowdall, 1999); 3) inter-generational equity (Mayston, 1999); 4) whole-of-government reporting (Chan, 2003); and 5) performance focused reporting (Guthrie et al., 1999). The theme of marketisation (Guthrie, 1998), although relevant to an analysis of CF comment letters, is not discussed because it would require an analysis of phase three of the IPSASB CF process which is beyond the scope of this study (see Section 1.3). Each of these themes are discussed in more detail below and will be used as axial codes for the purpose of

analysing comment letters submitted to the IPSASB by the respective stakeholder groups defined in Section 1.4. This is discussed in more detail in Section 3.1.

2.3.1 Private sector mimicry

As early as 1984, Hopwood (1984; 1994) identified an interest in bringing private sector management practices into the public sector. Hood (1991) noted the focus of NPM on the adoption of private sector management styles and in eliminating differences between the two sectors. This was in contrast to PPA which kept the public sector distinct from the private sector (Hood, 1995). Many professional accountants do not see a conceptual difference between the two sectors and held that their respective accounting practices should not differ significantly (English et al., 2005). Others have noted that there are limits in using private sector accounting in a public sector context (Guthrie et al., 1999).

Governments may be aware of their uniqueness, but they may still mimic private sector practices in order to obtain legitimacy on the global stage (Ter Bogt, 2008). Public sector accounting has, without doubt, drawn nearer to private sector accounting (Chan, 2003; Humphrey & Miller, 2012). Prior to the CF project, the IPSAS were closely aligned to IFRS (Christiaens et al., 2010). At this time, Christiaens et al. (2010) presented the view that the IPSASB considered the objective of public sector financial reporting to be the same as for the private sector. Christiaens et al. (2010) also identified a preference in some European public sectors for private sector accounting rules.

The IPSASB CF project arose out of a need for a CF that was relevant to the public sector (IPSASB, n.d.-b). The IPSASB did liase with their colleagues at the IASB who were concurrently revising the IFRS CF (IPSASB, n.d.-b) although the IPSASB CF has remained distinctive (IPSASB, 2014a). In developing a CF, some of the key issues which may provide evidence of private sector mimicry are expected to be those that have attracted controversy in the private sector, in particular: 1) the objectives of financial reporting; and 2) faithful representation versus reliability (Whittington, 2008). The general assumption is that, where

respondents in the IPSASB CF comment letter process show bias towards the conclusions reached in the IASB CF process, respondents are considered to tend towards the NPM theme of private sector mimicry as they are showing a preference for private sector accounting practices. A third issue, the scoping in or out of government business entities (GBEs) from the IPSASB CF, is also considered relevant when investigating private sector mimicry because such entities have been considered to be better suited to adopting private sector practices (Christiaens & Rommel, 2008). The three areas will now each be discussed briefly. Any other areas identified during the content analysis that provide evidence of private sector mimicry will also be considered (see Section 3.1.1).

The objectives of financial reporting

The IASB (2010) chose 'decision usefulness' as the objective of general purpose financial reporting in their CF, with a focus on the decisions that investors and creditors make. This was at the exclusion of accountability as an objective Whittington (2008). Whittington (2008) points out that this was a significant step away from the traditional stewardship role of accounting. He explains that decision usefulness is concerned more with the future, while accountability focuses on the past and management's integrity. Laughlin (2012, p. 45) argues that the decision usefulness of public sector financial information is limited and 'is fraught with definitional issues, judgement and uncertainty.' Ravenscroft and Williams (2009) show the link between decision usefulness and neo-liberalism, an ideology that has also been associated with NPM (Christensen, Lie, & Lægreid, 2008; Ellwood & Newberry, 2007). NPM would, therefore, be characterised by following the IASB's CF by including decision usefulness, while a progressive approach would be evidenced by a focus only on accountability.

Reliability and faithful representation

The IASB (2010) chose to replace the qualitative characteristic of 'reliability' with 'faithful representation'. This removed the potential trade-off between relevance and reliability (Whittington, 2008). The reduced accuracy (see IASB, 2010, QC15) brought about by the use of this term is in contrast to the

accuracy of a cash-based accounting approach which prevents estimations. Thus, a preference for reliability can be considered as supporting a PPA agenda, while faithful representation would represent NPM through private sector mimicry.

Government business entities

The scope of the IPSASB CF project excluded GBEs but the Board asked for comment on the appropriateness of this decision (IPSASB, 2010a). Christiaens and Rommel (2008) propose that GBEs are the only types of public entities that should apply private sector accrual accounting standards. The IPSASB CF acknowledges the uniqueness of the public sector as evidenced by it preface which outlines unique characteristics of the public sector (IPSASB, 2014a). A suggestion for the inclusion of GBEs in the IPSASB CF would support a wider chasm between the public and private sector because even profit-making entities of a government are not considered similar to the private sector. Including GBEs in the scope of the IPSASB CF is, therefore, not indicative of private sector mimicry and indicates a bias towards PPA.

2.3.2 Asset recognition

As discussed in Section 2.2, quantification was at the heart of enhanced accountability under NPM (Hood, 1991). The drive towards quantification and improved asset management has included the identifying and recording of assets on the balance sheet, including non-financial assets (Heald & Dowdall, 1999). Hopwood (1987) explains how organisational change does not only drive accountancy; accountancy can drive organisational change. Khan and Mayes (2009) note that wider asset recognition promotes an improvement in the management of assets and a greater understanding of the costs of holding and utilising those assets. It can improve internal control over and transparency of the management of assets and liabilities (Sanderson & van Schaik, 2008), thereby reducing the opportunity for misappropriation of assets,

fraud and corruption (World Bank, 2011). For example, in Australia, the introduction of accrual accounting forced government agencies to identify all assets and compile complete asset registers (Funnel et al., 2012).

Guthrie (1998) points out that many stakeholders have suggested that the recognition of assets on the balance sheet results in a more complete view of the costs of providing services, since a reduction in asset value (e.g. via depreciation) results in a charge to the income statement. The supposed implication of this is that cash accounting shows the cost of government services as cheaper than the cost of the equivalent services in the private sector (Guthrie, 1998). Guthrie (1998) shows that this is not true because the difference is only due to the timing of the recognition of transactions. There is benefit, however, in understanding the full cost on a period to period basis (Blöndal, 2003). Finally, together with liability recognition (see inter-generational equity in Section 2.3.3), full asset recognition helps to provide decision-useful information through a complete picture of the financial position of the organisation (Khan & Mayes, 2009).

There are also arguments against widespread recognition of public sector assets, particularly from a conceptual perspective (Lapsley et al., 2009). The existing definition of an 'asset' in the IASB's CF places emphasis on the flow of economic benefits to the reporting entity (IASB, 2010). Under this definition it can be argued that many public sector assets would not be recognised because they do not result in a direct flow of economic benefits (Mautz, 1988). For example, natural resources, museums and national monuments are useful for service delivery but may not result in cash flows to the entity (Guthrie, 1998). Mautz (1988) proposes that these resources are not assets, but that the costs of maintaining these assets should be included in commitments. Pallot (1990) argues for a wider conceptual definition of an 'asset' to include resources that are provided to the community as a part of service delivery. She recommends that these 'community assets' be classified separately in the balance sheet from traditional assets that are utilised by the reporting entity in service delivery (versus 'as service delivery'), and that the respective accounting treatments should differ (Pallot, 1990).

A similar problem arises on infrastructure such as roads, highways and water supply systems (Lapsley et al., 2009). The related expenditure gives rise to service potential (the potential for the infrastructure to be utilised by the public) and, with the right amount of maintenance, the infrastructure may have an indefinite useful life (Lapsley et al., 2009). This is in contrast to a traditional asset that is depleted through sale or use (Pallot, 1990). Guthrie (1998) warns that it will also be very difficult, if not arbitrary, to assign values to many public sector assets, limiting the usefulness of financial position information.

A key aspect of phase two of the IPSASB CF project was to develop a public sector specific definition of 'an asset', particularly one that adequately addresses the issues raised in this Section (see IPSASB, 2010b; IPSASB, 2012). One of the proposals put forward by the IPSASB was the inclusion of service potential in the conceptual definition of an asset (2010b). This would result in the recognition of additional assets, deliver greater accountability and would suggest a more NPM-slanted agenda (Heald & Dowdall, 1999).

In summary, the literature suggests that proponents of NPM would support the recognition of more assets on the balance sheet, as this provides expanded transparency, accountability and decision-usefulness. Those against NPM may be more conservative in the extent to which assets are recognised citing both conceptual and practical challenges.

2.3.3 Inter-generational equity

Financial reporting is not only about short-term financial performance but is also about transparency of the impact of today's decisions on future generations (Barrett cited in Guthrie, 1998). This is primarily represented by the recognition or disclosure of long-term liabilities and commitments, and the limiting of 'off balance sheet financing' (English et al., 2005; Hodges & Mellett, 1999; Mayston, 1999). The timing of finance costs is also important (Funnel et al., 2012). These costs should be planned and recognised as an asset is utilised, so that future generations do not pay for the cost of today's services, and vice versa (Chan, 2003; Funnel et al., 2012). Funnel et al. (2012) identify inter-generational equity as a tenet of the Australian

Government, where each generation is responsible for its own spending but is equally not expected to provide for future generations.

Similar to the asset recognition problem, liabilities have their own challenges in the public sector. Chan (2003) highlights the difficulty in separating the contractual or legal obligations of a government from its political commitments and general responsibility for the wellbeing of citizens. He suggests that an accrual basis of accounting could be applied to varying levels. On the liability side, a 'moderate' approach would include both short- and long-term liabilities, while a 'radical' approach would see legislated entitlement benefits being recognised as liabilities. Chan (2003) notes that the radical approach has little support due to inherent difficulties in accounting for these liabilities.

Recognition and/or disclosure of liabilities and commitments can also have a knock on effect in improving financial management (Funnel et al., 2012). If commitments are not identified they can lead to financial difficulties for the reporting entity in the future (Funnel et al., 2012). Bergmann (2012), who at the time of writing was the chair of the IPSASB, gives the example of Switzerland who, despite a severe global financial crisis, was able to reduce its national debt burden between 2004 and 2010. He credits this partially to an increased focus on the balance sheet brought about by the introduction of accrual accounting.

As with asset recognition, a commitment to inter-generational equity requires a recognition and/or disclosure of all liabilities and commitments for which an entity is responsible (Chan, 2003). Broader recognition of liabilities widens the accountability of management for inter-generational equity (Guthrie, 1998). To use Chan's (2003) terminology, the more radical the scope of obligations that should be recognised as liabilities, the greater the NPM agenda. In addition, prospective reporting that provides information on the impact of today's decisions on future generations would be aligned to this theme of inter-generational equity (Barrett cited in Guthrie, 1998) and would therefore be supportive of an NPM agenda.

2.3.4 Whole-of-government reporting

A key part of NPM reform has been the decentralisation or disaggregation of activities (Bisogno, Santis, & Tommasetti, 2015; Lapsley, 2008) through the separation of purchasers and providers (O'Flynn, 2007) and creating more focused and agile entities (Lapsley, 2008). Such reform was designed to create quasi-markets within the public sector (Hodges & Mellett, 1999) but it raises challenges for those wanting to see the bigger picture of government performance and financial stability. Global capital markets, in particular, are exerting pressure on countries to evidence fiscal restraint and strong debt management at a macroeconomic level (English et al., 2005). Financial consolidation is critical to fulfil the information and accountability needs of stakeholders in a decentralised government (Bisogno et al., 2015). This is often referred to in the literature as whole-of-government reporting (Adhikari et al., 2013; Bisogno et al., 2015; Chan, 2003; English et al., 2005; Guthrie et al., 1999; Khan & Mayes, 2009; Oulasvirta, 2014).

Whole-of-government reporting has significant practicality issues, especially in developing nations (Adhikari et al., 2013) although Khan and Mayes (2009) suggest a phased in approach which considers the limited skills on the ground. Whole-of-government reporting is necessary to maintain accountability and transparency of government and helps to ensure inter-generational equity at a macro level (Funnel et al., 2012). It follows that a pro-NPM stance would champion whole-of-government reporting and would tend to include more entities in the consolidated accounts and prevent the evasion of accountability (Chan, 2003). The IPSASB CF project addressed this issue in its phase one consultation paper and exposure draft, under the chapter on 'the reporting entity' (IPSASB, 2009).

2.3.5 Performance focused reporting

NPM brought about a shift in public sectors from process based accountability to results accountability (Guthrie et al., 1999). Under PPA the focus had been primarily on developing an elaborate structure of procedural rules, where the emphasis was placed on compliance with laws and regulations (Hood, 1995),

showing scant regard for the results of such procedures. NPM gave more attention to outcomes and performance based management (English et al., 2005) and controls surrounding these (Hood, 1991). As Hopwood (1984; 1994) explains, making visible what was previously unknown opens up areas of an organisation for examination and debate, hence an expanded accountability.

For some, accrual accounting was seen as a way to shift the focus to efficient and effective outcomes, but it is doubtful whether this is really possible since accrual accounting is still focused on what was spent, not what was done (Guthrie, 1998). A specific performance measurement approach was needed to shift the focus (Humphrey et al., 2005). The importance of quantification (see Section 2.2) can be cited as part of this drive as it provides a means for demonstrating achievements and performance (Lapsley, 1999).

In South Africa, public sector institutions are required to report on their performance against predetermined objectives in their annual report (IRBA, 2012). The information is also subjected to an audit (IRBA, 2012). This can be seen as evidence of support of the NPM theme of performance focused reporting. The support of such performance reporting, particularly as a part of GPFRs, can therefore be considered to be in support of NPM reforms. By contrast, support for reporting on compliance with laws and regulations is considered to be in support of PPA.

Performance focused reporting along with private sector mimicry, asset recognition, inter-generational equity and whole-of-government reporting represent five themes that can be used to analyse the preference of stakeholders for either PPA or NPM. These are summarised briefly in Table 1. In Section 2.4, stakeholder groups will be identified who may show a preference towards PPA or NPM within these themes.

Table 1: Summary of themes

	PPA	**NPM**
Private sector mimicry (Section 2.3.1)		
• **The objectives of financial reporting**	Disagree with decision usefulness as an objective of GPFRs. Favour accountability.	Favours decision usefulness as an objective of GPFRs.
• **Reliability and faithful representation**	Favour reliability as a qualitative characteristic.	Favour faithful representation as a qualitative characteristic.
• **GBEs**	Favour inclusion of GBEs in the CF.	Favour exclusion of GBEs in the CF.
	Other positions taken that show disagreement with positions taken in the IASB CF.	Other positions taken that show agreement with positions taken in the IASB CF.
Asset recognition (Section 2.3.2)	Favour limiting the number of assets recognised.	Favour increasing the number of assets recognised.
Inter-generational equity (Section 2.3.3)	Disagree with wider recognition of liabilities and commitments, and reporting prospective information showing the impact of today's decisions on future generations.	Favour wider recognition of liabilities and commitments, and reporting prospective information showing the impact of today's decisions on future generations.
Whole-of-government reporting (Section 2.3.4)	Disagree with the preparation of whole-of-government reports.	Favour the preparation of whole-of-government reports.
Performance focused reporting (Section 2.3.5)	Disagree with the reporting of performance against service delivery objectives.	Favour the reporting of performance against service delivery objectives.
	Favour reporting on compliance with laws and regulations.	Disagree with reporting on compliance with laws and regulations.

2.4 The role of accounting professionals and international institutions

Selznick explains that new practices may become 'infused with value beyond the technical requirements of the task at hand' (cited in DiMaggio & Powell, 1983, p. 148). The value of NPM accounting reforms may have been overestimated, but its adoption would seem to have been supported by environmental influences and the search for legitimacy as explained by new institutionalism (Adhikari et al., 2013; Carruthers, 1995; DiMaggio & Powell, 1983).

In describing new institutionalism, DiMaggio and Powell (1983) identify three types of isomorphism which drive the way institutions change: coercive isomorphism, mimetic isomorphism and normative isomorphism. Coercive isomorphism explains pressures exerted on organisations by other organisations, particularly where the organisation exerting the pressure is politically influential and the organisation experiencing the pressure is seeking legitimacy (DiMaggio & Powell, 1983). Mimetic isomorphism involves doing what other organisations do, particularly in times of uncertainty (DiMaggio & Powell, 1983). Normative isomorphism is linked to professionalisation where organisations seek to adopt practices supported by professional bodies (Adhikari et al., 2013; DiMaggio & Powell, 1983).

In the context of this thesis, normative isomorphism can be associated with the role played by accounting professionals in developing accounting standards for the public sector. Humphrey et al. (2005) suggest that accounting professionals, motivated by self-interest, have encouraged the development and adoption of accounting standards similar to those used in the private sector. This is in spite of questions around the real benefits of these standards (Guthrie et al., 1999). The jobs and functions of accounting professionals working in the public sector are increasingly dependent on the permanence of financial reforms that drive more complex reporting practices for which they are qualified (Humphrey et al., 2005). Similarly, the big-four accounting firms have a self-interest incentive to encourage public sectors to adopt the IPSAS because of its close alignment with International Standards on Financial Reporting (IFRS). Their expertise in IFRS would create significant revenue opportunities for these firms through consulting-, training- and audit-related services (Oulasvirta, 2014).

There is also a strong coercive isomorphic pressure (DiMaggio & Powell, 1983; Oulasvirta, 2014) brought about by international bodies such as the United Nations (UN), World Bank and International Monetary Fund (IMF) adopting the IPSAS and placing pressure on governments to do the same for the sake of enhanced financial management and accountability (Adhikari et al., 2013; Aggestam et al., 2013; Christiaens et al., 2010). In particular, countries which receive international funding are placed under pressure to adopt NPM reforms, including applying the IPSAS, to demonstrate their commitment to efficiency and accountability (Adhikari et al., 2013). Christiaens et al. (2010) explain that international organisations have promoted the IPSAS as 'good practice' and have situated their adoption as a moral issue.

Government agencies by contrast are expected to demonstrate an interest in maintaining the s*tatus quo* by lobbying (Watts & Zimmerman, 1978) for a CF that is more aligned to PPA, particularly by keeping the public sector distinct from the private sector and maintaining a focus on the complex procedural structures that they understand (Bezes et al., 2012; Hood, 1995). The latter may be from fear of being made irrelevant by NPM reforms (Bezes et al., 2012) . Under PPA, public servants enjoyed a separation from politicians and were valued for their expertise in public management (Bezes et al., 2012; Groot & Budding, 2008). NPM reforms have been utilised by governments around the world as political rhetoric to show a particular party's commitment to efficiency and accountability in the public sector (Bezes et al., 2012). This has cut across political ideology (Humphrey et al., 2005) suggesting that it is being used as a tool by political parties to take back control over the public service and to appear as reformist (Bezes et al., 2012; Lapsley, 2008). Chan (2003, p. 1) states that officials within government agencies 'rationally do not volunteer more information than is required or in their interest.' Government agencies are the institutions upon which the isomorphic pressures identified in this Section are expected to act and it follows that they may be resistant to strong NPM themes in the IPSASB CF.

An alternative argument to this is noted by Adhikari et al. (2013) who suggest that it may be mimetic isomorphic pressures that are driving public sectors around the world to adopt private sector accounting

practices. Under this theory, Adhikari et al. (2013) suggest that government agencies may perceive private sector practices to be more effective and efficient. Governments may implement private sector practices not simply because of the coercive pressures of international organisations or the normative pressures of accounting professionals but also due to an uncertainty as to the effectiveness and efficiency of current practices.

This research will investigate whether NPM accountancy reforms may be attributed to the role of accounting professionals and international institutions in opposition to the lobbying of government agencies, or if government agencies have begun to support these reforms as a result of different isomorphic pressures (see definitions for government agencies, accounting professionals and international organisations in Section 1.4). In order to test these theories, two main hypotheses were developed for this study:

H1: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.

H2: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.

Taking into the account the preference for an accounting framework aligned with public sector mimicry, asset recognition, inter-generational equity, whole-of-government reporting and performance focused reporting, and summarised in Table 1, the following sub-hypotheses break the main hypotheses up according to the themes which were identified in Section 2.3:

In respect of accounting professionals

H1.1: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.

H1.2: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.

H1.3: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'inter-generational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.

H1.4: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.

H1.5: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.

In respect of international organisations

H2.1: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.

H2.2: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.

H2.3: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'inter-generational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.

H2.4: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.

H2.5: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.

2.5 Summary

This Chapter concentrated on two distinct public sector management paradigms: PPA and NPM. It identified five themes that highlight where differences between PPA and NPM thinking can be identified in the IPSASB CF project (Section 2.3). It has also identified three categories of stakeholders involved in the comment letter process of the IPSASB CF project: government agencies, accounting professionals and international organisations (Section 2.4). There is a suggestion that accounting professionals and international organisations were the major protagonists in driving NPM reform. The paradigms, themes and

hypotheses are summarised in Table 2 below. The contents of the literature review will be used to guide the research method in the next Chapter.

Table 2: Summary of paradigms, themes and hypotheses

Theme	Section	Hypotheses	PPA	NPM	Primary references
1. Private sector mimicry (H1.1 and H2.1)	2.3.1	H1.1 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies. H2.1 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.	Accountability Reliability Include GBEs in scope Other areas where IASB CF is no mimicked	Decision usefulness Faithful representation Exclude GBEs in scope Other areas where IASB CF is mimicked	Laughlin (2012); Whittington (2008) Whittington (2008) Christiaens and Rommel (2008)
2. Asset recognition (H1.2 and H2.2)	2.3.2	H1.2 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies. H2.2 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.	Recognise less assets	Recognise more assets	Heald and Dowdall (1999)
3.Inter-generational equity (H1.3 and H2.3)	2.3.3	H1.3 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'inter-generational equity' theme to a greater extent than the content of the comment letters submitted by government agencies. H2.3 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'inter-generational equity' theme to a greater extent than the content of the comment letters submitted	Recognise/ disclose less liabilities and commitments and don't report prospective information	Recognise/ disclose more liabilities and commitments and report prospective information	Chan (2003); Funnel et al. (2012)

Theme	Section	Hypotheses	PPA	NPM	Primary references
		by government agencies.			
4. Whole-of-government reporting (H1.4 and H2.4)	2.3.4	H1.4 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies. H2.4 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.	Don't prepare whole-of-government reports	Prepare whole-of-government reports	Bisogno et al. (2015); Chan (2003)
5. Performance focused reporting (H1.5 and H2.5)	2.3.5	H1.5 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies. H2.5 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.	Don't report performance against service delivery objectives Report compliance with laws and regulations	Report performance against service delivery objectives Don't report compliance with laws and regulations	English et al. (2005); Hood (1991); Humphrey et al. (2005)

Chapter III – Methodology

The research was conducted utilising a mixed method (Creswell & Planco Clark, 2011) by complementing a qualitative content analysis (Leedy & Ormrod, 2010) of comment letters with a quantitative analysis of the results of the content analysis. The paper was primarily inspired by an interpretive approach (Leedy & Ormrod, 2010) which enabled the researcher to explore new insights about the preference of stakeholder groups for NPM or PPA respectively. The exploratory nature of the research is best suited to a more qualitative approach to the data analysis, especially given the relatively small number of comment letters which cannot be considered to be indicative of the views of all stakeholders. For this reason, it was not considered appropriate to utilise extensive inferential statistics.

3.1 Content analysis

The research began with a content analysis of comments letters received by the IPSASB during its CF project. Content analysis is considered appropriate when analysing comment letters as it allows the researcher to codify into categories the opinions contained in the comment letters so that these opinions can be analysed (Holder, Karim, Lin, & Woods, 2013). Comment letters are considered in accounting literature as an appropriate way to understand the preference of stakeholders (Kwok & Sharp, 2005; Watts & Zimmerman, 1978). Comment letters can be analysed in two ways, either using form-orientated analysis, which focuses on quantitative aspects such as word count, or meaning-orientated analysis which analyses the meaning of the content of the comment letters (Yen, Hirst, & Hopkins, 2007). The latter was considered preferable for this study because it gave the information needed to analyse the preference of respondents towards either PPA or NPM. Several studies have conducted meaning-orientated analysis on comment letters by looking at the types of arguments expressed (see Bisogno et al., 2015; Chatham, Larson, & Vietze, 2010; Giner & Arce, 2012; Yen et al., 2007) but this study will follow a similar approach to Kwok and Sharp (2005) who focused on the positions taken by each respondent rather than on the detailed argument. These arguments were, however, considered for purposes of understanding the quantitative results.

3.1.1 Development of the measuring instrument

The detail of the comment letters was examined for specific positions taken on each of the themes identified in Section 2.3 of the literature review (examples are also given under the subheadings in this section). These served as axial codes for the purpose of the content analysis.

The process of classifying comment letters is very subjective (Brown & Feroz, 1992). To minimise the subjectivity, the individual issues utilised in the analysis have been primarily selected from the consultation documentation's specific matters for comment (phase one exposure draft and phase two consultation paper and exposure draft) and preliminary views (phase one consultation paper), similar to the approach taken by Giner and Arce (2012)[1]. The phase two consultation paper did not express any initial views of the IPSASB (IPSASB, 2010b) but the phase one consultation paper did provide preliminary views of the IPSASB (IPSASB, 2009). The exposure drafts both provided the IPSASB's views updated for the input obtained from stakeholders through the consultation papers, and asked respondents to provide their views on specific matters for comment (IPSASB, 2010a, 2012).

Kwok and Sharp (2005) highlight that content analysis is limited in its effectiveness by the categories that are chosen and that the classification scheme must reflect the purpose of the research. Only those specific matters for comment and preliminary views which are relevant to the themes identified in the literature review were selected. In addition, specific matters for comment and preliminary views were included only where it would be easy to identify the explicit position of a respondent (Brown & Feroz, 1992). Specific matters for comment and preliminary views that were not likely to give rise to a clear show of support for one or the other position or which could produce various alternative views were excluded from the scope of the content analysis (Carvalho, de Albuquerque, Quirós, & Justino, 2015).

Central to any qualitative analysis is the process of coding the data (Creswell & Planco Clark, 2011). The researcher defined the responses that were considered as showing a preference for PPA and NPM respectively, sub-divided

[1] Giner and Arce (2012), during their content analysis of IFRS 2 comment letters, based their selection of issues for consideration on the 'Invitation to comments' included in the IFRS 2 discussion paper and their understanding of the key accounting issues as identified in the literature.

according to the themes identified in Section 2.3 (similar to the work performed by Saemann (1999)). The specific responses were outlined in a scoring plan which will be used as the measurement instrument (see Appendix A), similar to that used by Carvalho et al. (2015)[2] and Kwok and Sharp (2005)[3]. A brief summary of the classification principles which were applied within each theme and the relevant sections of the CF project follows.

Private sector mimicry

The theme of private sector mimicry was analysed utilising phase one of the IPSASB CF project, in particular chapters one (Role, authority and scope of the conceptual framework), two (Objectives of financial reporting) and three (Qualitative characteristics) of the CF project. Phase 2 was also utilised, in particular specific matters for comment about the income and expense-led approach or the asset and liability-led approach to defining revenue and expenses (Consultation Paper 2), and the inclusion of deferred inflows and deferred outflows as elements (Exposure Draft 2).

The principle applied to this theme was that positions that follow that of the IASB CF (IASB, 2010) were considered indicative of an NPM preference due to private sector mimicry (see Section 2.3.1). For example the inclusion of decision-usefulness as an objective of financial reporting would bring the IPSASB CF closer to the IASB CF (Whittington, 2008), while limiting the objective to only accountability would suggest a PPA preference (Laughlin, 2012).

Asset recognition

The theme of asset recognition was analysed utilising phase two of the IPSASB CF project, in particular the discussion in the CF on the definition of an 'asset'. The principle applied to this theme was that any position that supports a definition which expands the recognition of assets is indicative of the NPM theme of asset recognition

[2] Carvalho et al. (2015) identified a cultural value that could be assigned to either a positive or negative response to specific exposure draft questions.
[3] Kwok and Sharp (2005) identified key accounting issues in the 'Invitation to Comment' section of consultation papers. For each comment letter that supported a proposed outcome they assigned a +1 and for each comment letter that opposed the proposed outcome they assigned a -1

(see Section 2.3.2). For example, the inclusion of service potential in addition to economic benefits would result in the recognition of more assets and therefore represents a preference for NPM (Heald & Dowdall, 1999).

Inter-generational equity

The theme of inter-generational equity was analysed utilising the section in phase one of the IPSASB CF project that deals with the scope of the CF. It was also analysed utilising phase two, in particular the discussion in the CF on the definition of a 'liability'. The principle applied to the scope of the CF was that the inclusion of prospective information in GPFRs is indicative of an NPM preference, while a PPA stance would favour only historical information (Funnel et al., 2012). The principle applied to the definition of a liability was that proponents of NPM would support a definition that resulted in the recognition of more liabilities (see Section 2.3.3). For example, if the definition of a liability covers performance obligations in addition to traditional financial obligations, more liabilities will be recognised and the definition can be considered to be more in line with NPM (Chan, 2003).

Whole-of-government reporting

The theme of whole-of-government reporting was analysed utilising phase one of the IPSASB CF project, specifically the second part of chapter four of the CF on the group reporting entity. The principle applied to this theme was that respondents who have a preference for NPM doctrines would favour the preparation of whole-of-government reports (see Section 2.3.4). For example, if the concept of a group reporting entity was excluded from the IPSAS Framework it would be less likely that governments would prepare whole-of-government reports resulting in reduced accountability at a macro-level in support of a narrower approach to accountability as is typical of PPA (Chan, 2003).

Performance focused reporting

The theme of performance focused reporting were analysed utilising the section in phase one of the IPSASB CF project that deals with the scope of the CF. The principle applied to this theme was that the inclusion of non-

financial information detailing the entity's performance against its service delivery objectives is in line with NPM principles (see Section 2.3.5). In addition, the inclusion of reporting on compliance with budget and/or laws and regulations is indicative of PPA principles (see Section 2.3.5). For example, if a respondent recommends that a reporting entity's achievement of its service delivery objectives should be included in the scope of GPFRs, this is indicative of an NPM stance (English et al., 2005).

3.1.2 Reliability of the measuring instrument

The researcher tested the reliability of the scoring plan as a measurement instrument by determining interrater reliability (Creswell & Planco Clark, 2011; Leedy & Ormrod, 2010). This proved that the scoring plan gives consistent results (Creswell & Planco Clark, 2011; Leedy & Ormrod, 2010). This approach is similar to that used by Yen et al. (2007) for their content analysis of comment letters. A commerce post graduate student[4] was utilised as a research assistant who performed the comment letter analysis on a sample of twelve comment letters (three for each consultation paper and exposure draft). The results were compared to the results of the researcher on the same sample. Differences that were noted were discussed between the researcher and the research assistant and consensus was reached in most case. Where consensus was not reached, the impact of the differences on the validity of the measuring instrument was assessed and the measuring instrument was updated accordingly.

The themes and sub-themes utilised in the measuring instrument were derived from the literature (see Section 2.3) which assists in limiting bias. An iterative process was followed such that additional sub-themes identified during the content analysis resulted in the measuring instrument being revised (Creswell & Planco Clark, 2011). It is in the nature of an exploratory study for the approach to be inherently subjective unlike a positivist study. Such subjectivity is not therefore considered a threat to validity or reliability.

[4] Acknowledgement and thanks is given to the research assistant Hopewell Hlatshwayo, a technical manager at the Auditor General South Africa, who is currently studying at the University of Pretoria towards a Master of Commerce degree.

3.1.3 Procedure to analyse the comment letters

For each comment letter, the researcher began by identifying which stakeholder group the respondent fell into based on the definitions in Section 1.4. In instances where the categorisation of a particular respondent was not clear from their comment letter, further investigation was performed through an internet search to determine the nature of the respondent[5]. The researcher then determined which specific responses in the scoring plan are relevant to the comment letter. For example, if the comment letter related to the phase one exposure draft, only those scoring plan responses that relate to the phase one exposure draft were considered. The detailed categorisation of all respondents is included in Appendix B.

The researcher then read each comment letter several times, identified the position taken by the respondent for each relevant response and applied axial coding (Leedy & Ormrod, 2010) to categorise the positions according to the scoring plan. After the coding was completed for all the letters, the letters were reread to confirm the consistent coding of responses. Such categorisation was recorded in an Excel spreadsheet as showing a preference for either 'PPA' or 'NPM' or 'none', the latter representing a response that was neutral or silent on the particular issue (Kwok & Sharp, 2005). Positions were classified according to theme and the respondent's stakeholder group. The positions were recorded against each respondent's name.

In addition to the coding of the letters, qualitative comments and arguments were captured in the Excel spreadsheet according to each sub-theme that was identified. The second reading of all letters was also used for this purpose to confirm that the comments and arguments recorded were consistent, accurate and complete. These qualitative notes were used to help analyse the quantitative results arising from the analysis described in Section 3.3 (see Sections 4.3 to 4.7).

[5] For example, it was not clear from the comment letters submitted whether the International Consortium of Governmental Financial Managers was a professional organisation or simply representative of the views of government agencies. A review of their website (www.icgfm.org) showed that their members comprise various accounting professionals including those working within and outside of government. They encourage continued professional development in their members. They were therefore identified as an accounting professional body.

3.2 Population and sampling

The population was defined as the comment letters submitted during phase one and phase two of the CF project. Each phase had a consultation paper and subsequent exposure draft. A one hundred percent sample was analysed due to the relatively low number of comment letters received by the IPSASB during each phase (between 36 and 55 for each request for comment). An analysis of the comment letters submitted per stakeholder group and country has been documented in Section 4.1.

3.3 Quantitative analysis

A quantitative analysis was performed on the data arising out of the content analysis (see Section 4.2). The position taken by respondents for each question was classified on a binary scale where a one represented a preference towards a particular position and a zero represented no preference towards that position. In other words, an answer that showed a preference for PPA or NPM resulted in a one being added to the PPA or NPM column respectively. A response that was deemed neutral or silent resulted in a one being added to 'None'. These individual scores were then totalled for each theme per respondent category and were used to develop two-by-two contingency table for each hypothesis and sub-hypothesis. A chi-square test, as applied in similar studies (Carvalho et al, 2015; Giner & Arce, 2012; Kwok & Sharp, 2005; Saemann, 1999), was utilised to analyse this data. The chi-square test assists in analysing whether two or more independent groups differ in terms of a particular characteristic (Carvalho et al., 2015).

The chi-square test requires two assumptions to hold (Krishnan, 2011). Firstly, the test only provides an approximate p-value, and the accuracy of this approximation is reduced for smaller sample sizes (Krishnan, 2011). If more than 20% of the contingency cells had values less than five, a Fisher's exact test was applied instead of the chi-square test (Krishnan, 2011; Saemann, 1999). Secondly, the data must be independent because the test cannot be applied to

correlated data (Krishnan, 2011). This was not considered a problem for this study because the comment letters are assumed to be compiled independently of each other[6].

The test was applied to the following null hypotheses:

$H1_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the doctrines of NPM as compared to the content of the comment letters submitted by government agencies.

$H2_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the doctrines of NPM as compared to the content of the comment letters submitted by government agencies.

The chi-square test as also applied individually to each of the following null sub-hypotheses:

$H1.1_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the 'private sector mimicry' theme as compared to the content of the comment letters submitted by government agencies.

$H1.2_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the 'asset recognition' theme as compared to the content of the comment letters submitted by government agencies.

$H1.3_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the 'inter-generational equity' theme as compared to the content of the comment letters submitted by government agencies.

$H1.4_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the 'whole-of-government reporting' theme as compared to the content of the comment letters submitted by government agencies.

$H1.5_0$: The content of comment letters submitted by accounting professionals during the IPSASB CF process does not differ in its association with the 'performance focused reporting' theme as compared to the content of the comment letters submitted by government agencies.

$H2.1_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the 'private sector mimicry' theme as compared to the content of the comment letters submitted by government agencies.

$H2.2_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the 'asset recognition' theme as compared to the content of the comment letters submitted by government agencies.

[6] Many respondents commented on both the consultation paper and exposure draft for the respective phases. The scoring of the consultation paper and exposure draft was performed using a different set of questions for each consultation document (see Appendix A). This ensures independence on a question by question basis.

$H2.3_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the 'inter-generational equity' theme as compared to the content of the comment letters submitted by government agencies.

$H2.4_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the 'whole-of-government reporting' theme as compared to the content of the comment letters submitted by government agencies.

$H2.5_0$: The content of comment letters submitted by international bodies during the IPSASB CF process does not differ in its association with the 'performance focused reporting' theme as compared to the content of the comment letters submitted by government agencies.

An acceptable p-value of 5% was applied, as has been used in similar studies (see Carvalho et al., 2015). Where a null hypothesis was rejected, the reason for the difference in association was investigated manually to ascertain whether the accounting professionals or international bodies showed a greater alignment to PPA or NPM as compared to their government counterparts.

Chapter IV – Results

This chapter documents both the quantitative results of this study and a more detailed qualitative analysis. Section 4.1 gives an understanding of how many comment letters were submitted per phase, stakeholder group and country. Section 4.2 outlines and describes the quantitative results for each hypothesis and its sub-hypotheses. Sections 4.3 provides detailed qualitative analysis of H1 and its sub-hypotheses. Section 4.4 provides detailed qualitative analysis of H2 as a whole.

4.1 Analysis of respondents

This section analyses the nature of the respondents who submitted comment letters to the IPSASB during Phase 1 and Phase 2 of the CF project. It considers the number of comment letters submitted by the respective respondents. The respondents and their letters are first considered based on categorisation by stakeholder group (Section 4.1.1) and then by country (Section 4.1.2).

4.1.1 Analysis of comment letters by stakeholder group and consultation phase

Table 3 summarises the respondents per consultation phase, categorised by stakeholder group. There were 186 comments letters listed on the IPSASB website. Thirty-four of these were excluded from this research because (1) the files were corrupted; (2) the respondent did not meet any of the three stakeholder group definitions[7]; (3) the letter did not address issues relevant to this research or (4) the stakeholder had already participated in the submission of another letter. This left 152 letters considered relevant for this research. A detailed explanation for the categorisation of each letter is available in Appendix B.

[7] Respondents excluded on this basis were mostly individuals or universities.

Table 3: Summary of comment letters by stakeholder group and consultation phase

Consultation phase	Accounting professionals	Government agencies	International organisations	Sub total	Unclassified	Total
CP1[8]	22	19	1	**42**	13	**55**
ED1[9]	24	17	2	**43**	12	**55**
CP2[10]	18	12	1	**31**	5	**36**
ED2[11]	24	9	3	**36**	4	**40**
Total	**88**	**57**	**7**	**152**	**34**	**186**

Phase 2 (CP2 and ED2) saw significantly fewer letters being submitted. Sixty-seven letters were relevant to this research in phase 2 compared with 85 letters for phase 1. Government agencies submitted 36 letters during phase 1 but only 21 letters during phase 2, accounting for the majority of the reduction in comment letters. Only 9 letters were submitted by government agencies in response to ED2. In contrast, accounting professionals submitted 46 letters during phase 1 and 42 letters during phase 2, with a marginal increase as the CF project progressed.

International organisations submitted only 7 letters in total. Their largest number of letters, being 3, were submitted in response to the ED2.

4.1.2 Analysis of comment letters by stakeholder group and country

The comment letters have also been categorised by country to aid the analysis of the results (see Table 4). The countries which submitted the most comment letters were Canada (28), the United Kingdom (20) and Australia (18). Fourteen letters were submitted by international respondents, comprising seven international accounting firms or accounting professional organisations and seven from international organisations (as defined in Section 1.4).

Only 18 letters were submitted in total by developing countries[12]. Only one of these letters was from a government agency (Hong Kong SAR). All other letters from developing countries were from accounting professionals.

[8] Phase 1 consultation paper (IPSASB, 2009)
[9] Phase 1 exposure draft (IPSASB, 2010a)
[10] Phase 2 consultation paper (IPSASB, 2010b)
[11] Phase 2 exposure draft (IPSASB, 2012)
[12] Country classification was performed based on data available in UN (2016).

Table 4: Summary of respondents by stakeholder group and country[13]

Country	Accounting professionals	Government agencies	International organisations	Total
Argentina*	3			**3**
Australia	11	7		**18**
Belgium	1			**1**
Canada	5	23		**28**
Denmark		2		**2**
Europe	3			**3**
Finland		1		**1**
France	2	8		**10**
Germany	4			**4**
Hong Kong SAR[14] *		1		**1**
International	7		7	**14**
Ireland	1			**1**
Jamaica*	1			**1**
Japan	2			**2**
Kenya*	1			**1**
Malaysia*	1			**1**
Malta	2			**2**
Netherlands	1	1		**2**
New Zealand	7	3		**10**
Nigeria*	1			**1**
Pakistan*	2			**2**
Sierra Leone*	1			**1**
South Africa*	5			**5**
Sweden	1	4		**5**
Switzerland		4		**4**
United Kingdom	19	1		**20**
United States of America	7			**7**
Zambia*	2			**2**
Total	**90**	**55**	**7**	**152**

*Developing country (based on UN (2016))

Twenty-three letters were submitted by Canadian government agencies, representing 42% of all letters submitted by government agencies that were considered relevant to this research. Most of these letters originated in government agencies from various provinces and territories in Canada. The letters, therefore, carry a heavy weighting in the quantitative analysis. These letters carry very similar views as can be seen in the detailed qualitative results in Section 4.3. For this reason, detailed quantitative results for H1 and its sub-hypotheses have been reported below on both an 'including Canada' and 'excluding Canada' basis. This will allow for a richer understanding of the

[13] The reasons for the low response rates from specific countries (for example, the relatively low response rate from the United States of America) is beyond the scope of the study. Similarly, the reasons for the low response rates from international organisations is beyond the scope of the study.
[14] Special Administrative Region of China

relationship between accounting professionals and government agencies. A similar approach will be followed for the quantitative analysis per theme where specific consideration will be given to the isomorphic pressures in Canada as compared to the rest of the world.

4.2 Quantitative analysis

In this section, the results of the main hypotheses, H1 and H2, and their respective sub-hypotheses are reported. The results are reported both 'including Canada' and 'excluding Canada' as explained in Section 4.1.2.

4.2.1 Results for H1

The results for H1 are reported in Table 5. When including Canadian respondents, H1 is accepted. When excluding Canadian respondents, H1 is still accepted although with a higher p-value.

Table 5: Summary of results from quantitative analysis for H1

Hypothesis	Accounting professionals		Government agencies		p-value	Result
	PPA	NPM	PPA	NPM		
H1 (Including Canada)	212 (24%)	538 (62%)	194 (35%)	234 (42%)	0.000	Accept
H1 (Excluding Canada)	200 (24%)	501 (61%)	90 (28%)	160 (50%)	0.028	Accept

As can be seen in Table 5, after adjusting for Canadian letters, there was very little movement in the accounting professionals' preferences analysed on a percentage basis. The reason for the higher p-value can be attributed to the movement in government agency preferences. Government agencies scored 35% and 42% for PPA and NPM respectively when including Canadian letters. The split changed to 28% and 50% when excluding the Canadian comment letters. Canadian government agencies showed a higher overall preference for PPA than government agencies in other countries.

The results per sub-hypothesis of H1 are reported in Table 6.

Table 6: Summary of results from quantitative analysis for the H1 sub-hypotheses

Theme	Hypotheses	Adjustments	Accounting professionals		Government agencies		p-value	Result
			PPA	NPM	PPA	NPM		
1. Private sector mimicry	H1.1 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	23 (8%)	200 (72%)	33 (17%)	115 (59%)	0.002	Accept
		Excluding Canada	21 (8%)	185 (71%)	14 (12%)	74 (65%)	0.166	Reject
2. Asset recognition	H1.2 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	42 (35%)	71 (59%)	29 (44%)	29 (44%)	0.107	Reject
		Excluding Canada	40 (35%)	67 (59%)	14 (37%)	20 (53%)	0.692	Reject
3. Inter-generational equity	H1.3 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'intergenerational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	99 (30%)	193 (58%)	78 (42%)	59 (32%)	0.000	Accept
		Excluding Canada	94 (30%)	181 (57%)	40 (36%)	39 (35%)	0.008	Accept
4. Whole-of-government reporting	H1.4 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	1 (2%)	34 (72%)	15 (43%)	14 (40%)	0.000*	Accept
		Excluding Canada	1 (2%)	31 (70%)	2 (10%)	14 (70%)	0.254*	Reject
5. Performance focused reporting	H1.5 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	47 (50%)	40 (43%)	39 (56%)	17 (24%)	0.063	Reject
		Excluding Canada	44 (50%)	37 (42%)	20 (50%)	13 (33%)	0.540	Reject

*Using a two tailed Fisher's exact test

When including the Canadian responses, H1.1 (private sector mimicry), H1.3 (inter-generational equity) and H1.4 (whole-of-government reporting) were accepted. H1.2 (asset recognition) and H1.5 (performance focused reporting) were rejected. This means that the content of comment letters submitted by accounting professionals is associated with the themes of private sector mimicry, inter-generational equity and whole-of-government reporting to a greater extent than the comment letters submitted by government agencies. This provides evidence of the isomorphic pressure discussed in Section 2.4. The nature of this isomorphic pressure will be analysed in more detail in Section 4.3.

When excluding the Canadian responses, only H1.3 (inter-generational equity) was accepted. All other sub-hypotheses were rejected. This means that, when Canadian responses are not taken into account, the content of comment letters submitted by accounting professionals is only associated with the inter-generational equity theme to a greater extent than the comment letters submitted by government agencies. This suggests that there is less isomorphic pressure in non-Canadian countries than in Canada. This will also be analysed in more detail in Section 4.3.

It is noted that, in spite of only one sub-hypothesis being accepted, H1 was accepted when the responses were considered in total. This is because of the consistently greater preference shown by accounting professionals for NPM under all themes when compared to government agencies. These greater preferences were not statistically significant individually which resulted in the rejection of four of the sub-hypotheses. When aggregated, however, these greater preferences became statistically significant and resulted in the acceptance of H1.

4.2.2 Results for H2

The results for H2 are reported in Table 7. H2 is rejected irrespective of the inclusion or exclusion of Canadian respondents. There is no evidence from this result of any significant isomorphic pressures being exerted by international organisations.

Table 7: Summary of results from quantitative analysis for H2

Hypothesis	International organisations		Government agencies		p-value	Results
	PPA	NPM	PPA	NPM		
H2 (Including Canada)	13 (19%)	26 (39%)	194 (35%)	234 (42%)	0.149	Reject
H2 (Excluding Canada)	13 (19%)	26 (39%)	90 (28%)	160 (50%)	0.746	Reject

The results per sub-hypothesis are reported in Table 8. All sub-hypotheses were rejected irrespective of the inclusion or exclusion of Canadian respondents. Again, no evidence is provided by this analysis of isomorphic pressures being exerted by international organisations. These results, together with the overall result for H1, suggest that the comment letter process is not being used by international organisations to exert isomorphic pressures on public sectors around the world through the IPSASB CF process. This will be analysed in further detail in Section 4.4.

It is noted that, of the total of 67 points that were available in the measuring instrument for comment letters from international organisations, 28 were allocated to "none" due to either a neutral response or no view being expressed on the particular issue. This has limited the amount of data available to evaluate the preferences of international organisations. This limited the opportunities for statistically significant preferences to be evidenced for H2 and its sub-hypotheses. It was, therefore, unlikely that isomorphic pressures from international organisations could be identified without further analysis. More focus has been placed on the detailed qualitative analysis of the comment letters from international organisations (see Section 4.4).

Table 8: Summary of results from quantitative analysis for the H2 sub-hypotheses

Theme	Hypotheses	Adjustments	International organisations		Government agencies		p-value	Result
			PPA	NPM	PPA	NPM		
1. Private sector mimicry	H2.1 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	1 (5%)	12 (63%)	33 (17%)	115 (59%)	0.304*	Reject
		Excluding Canada	1 (5%)	12 (63%)	14 (12%)	74 (65%)	0.685*	Reject
2. Asset recognition	H2.2 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	3 (30%)	4 (40%)	29 (44%)	29 (44%)	1.000*	Reject
		Excluding Canada	3 (30%)	4 (40%)	14 (37%)	20 (53%)	1.000*	Reject
3.Inter-generational equity	H2.3 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'intergenerational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	7 (24%)	8 (28%)	78 (42%)	59 (32%)	0.447	Reject
		Excluding Canada	7 (24%)	8 (28%)	40 (36%)	39 (35%)	0.778	Reject
4. Whole-of-government reporting	H2.4 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	0 (0%)	1 (33%)	15 (43%)	14 (40%)	1.000*	Reject
		Excluding Canada	0 (0%)	1 (33%)	2 (10%)	14 (70%)	1.000*	Reject
5. Performance focused reporting	H2.5 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	2 (33%)	1 (17%)	39 (56%)	17 (24%)	1.000*	Reject
		Excluding Canada	2 (33%)	1 (17%)	20 (50%)	13 (33%)	1.000*	Reject

*Using a two tailed Fisher's exact test

4.3 Qualitative analysis – H1

This section provides a more detailed analysis of the results described in Section 4.2 for H1 and its sub-hypotheses. It utilises the detailed quantitative results from each theme together with the qualitative observations made by the researcher during the content analysis to understand better the isomorphic pressures that were identified in the quantitative results. The Section will focus primarily on evidence of isomorphic pressures and will not discuss at length areas where no isomorphic pressures were identified.

4.3.1 Private sector mimicry (H1.1)

In Section 4.2.1 it was noted that H1.1 was accepted when including Canadian responses but rejected when excluding Canadian responses. There is, therefore, a difference in the positions taken by Canadian government agencies and accounting professionals respectively. Outside of Canada there was only a marginally greater preference (see Table 6) from accounting professionals for NPM (although this was not statistically significant). This sub-section will first analyse the specific areas of resistance from Canadian government agencies and will then consider the levels of normative isomorphic pressures outside of Canada.

A detailed analysis of the results revealed that Canadian government agencies were more aligned to PPA than accounting professionals with respect to their views on the objectives of financial reporting (SPN[15] 1 and 4), the approach to defining revenue and expenses (SPN 6) and the identification of deferred inflows and deferred outflows as separate elements (SPN 7). These are all areas where they are showing resistance to isomorphic pressures by holding positions that do not mimic the private sector. Each of these areas are now discussed briefly.

[15] SPN (Scoring Plan Number) references refer to the specific scoring plan criteria numbers as presented in Appendix A.

Canadian government agencies showed resistance to the objective of decision usefulness. Decision usefulness is the only objective in the IASB CF (IASB, 2010). They were in favour of accountability being the primary objective with decision usefulness at most being relegated to a secondary objective. Detailed arguments were provided by these respondents to support their positions. Almost all other respondents, including Canadian accounting professionals, agreed that both accountability and decision usefulness should be objectives of financial reporting in the public sector. Only a minority of accounting professionals were in favour of decision usefulness as the sole objective.

The majority of Canadian government agency respondents supported the revenue and expense-led approach as described in CP2. Similarly, the majority of Canadian government agencies supported the identification of deferred inflows and deferred outflows as separate elements[16]. Both these positions are opposed to the approach taken in the IASB CF (IASB, 2010). They supported their positions by citing alignment to budget principles, matching of revenues to the periods when the money will be spent and a decrease in volatility on the income statement. These arguments were countered by accounting professionals who explained that a revenue and expense-led approach is open to manipulation and smoothing of results. They argued that financial performance should be represented faithfully irrespective of volatility and that the financial statements should not be used to drive inter-period equity. The latter was considered by accounting professionals to be a policy decision of government that cannot be achieved through accounting rules. The Canadian PSAB (CP2) were particularly strong in their arguments in support of an asset and liability-led approach. In this way, there is evidence of normative isomorphic pressure from accounting professionals in Canada because of their support for the decision-usefulness objective and the asset and liability-led approach. This pressure appears, however, to be resisted by Canadian government agencies.

Other countries did not show the same level of resistance to isomorphic pressures from accounting professionals. Australian and United Kingdom respondents from both stakeholder groups showed a strong

[16] The identification of deferred inflows and deferred outflows as separate elements in ED2 represented a proposal that was aligned to the income and expense-led approach (IPSASB, 2010b).

preference for private sector mimicry and the concept of sector neutrality[17]. This provides evidence that institutional change has taken placed in these countries with respect to private sector mimicry. It suggests that mimetic isomorphic pressures have influenced government agencies in these countries.

Individual European countries showed more mixed views on private sector mimicry with government agencies in Finland, France, Switzerland and Denmark providing evidence of resistance. There was no evidence of isomorphic pressures for private sector mimicry from accounting professionals in these countries, other than through the role of accounting professionals with an international presence (see below). Accounting professionals in France held similar levels of resistance to private sector practices as French government agencies. For example, French respondents from both stakeholder groups showed a preference for prudence being included in the qualitative characteristics (see SPN 3.3 and 5.3). The government agencies in other European countries were more accepting of private sector practices, in particular Sweden. This highlights a degree of mimetic isomorphism.

Accounting professionals in general referred to the IASB CF to a greater extent when arguing in support of private sector mimicry. Some government agencies supported positions that were aligned to the IASB CF but without specifically mentioning the IASB. Accounting professionals that have an international presence[18] were particularly strong in their support of private sector mimicry. This included the Federation of European Accountants (FEE) who were predominantly aligned to NPM in their responses, showing evidence of accounting professionals playing a normative isomorphic role in supporting private sector practices in Europe.

In summary, significant normative isomorphic pressures were identified in Canada to encourage adoption in the public sector of private sector accounting practices. Government agencies in Canada appear to resist these pressures resulting in the initial acceptance of H1.1. In most other countries there was greater acceptance of private sector practices, particularly in Australia, the United Kingdom and Sweden.

[17] Sector neutrality shows a preference for one accounting framework for all sectors and ensures that a transaction is reported the same way irrespective of the sector it occurs in.
[18] These accounting professionals are comprised of international auditing firms (KPMG and Ernst & Young) and international professional accountant organisations (FEE and ICGFM).

Institutional change has taken place in these countries, at least in part, due to mimetic isomorphism. Accounting professionals with an international presence are playing a strong normative isomorphic role in driving private sector mimicry although there is limited resistance to these pressures outside of Canada and some European countries. This resulted in the rejection of H1.1 after excluding Canadian respondents.

4.3.2 Asset recognition (H1.2)

In Section 4.2.1 it was noted that H1.2 was rejected irrespective of the inclusion or exclusion of Canadian respondents. The detailed positions and arguments presented of both accounting professionals and government agencies were similar, supporting the rejection of the hypothesis. There was only limited differences in the views expressed with respect to the inclusion of 'unconditional rights' as a benefit that can give rise to an asset (SPN 8.2).

Accounting professionals were mostly in favour of including 'unconditional rights' as a benefit that can give rise to an asset, while government agencies were divided on the issue. Government agencies who opposed its inclusion cited concerns that it would result in a wide interpretation of assets resulting in the recognition of government land, forests, water, mineral rights and other natural resources. Concerns were expressed around the measurability of such resources with some government agencies proposing that only purchased rights can be assets. This provides some limited evidence of resistance from government agencies to isomorphic pressures exerted by accounting professionals.

This limited evidence is, however, not sufficient to support the hypothesis. In general, government agencies and accounting professionals held similar views on asset recognition. Isomorphic pressures and resistance were only identified in the discussion of 'unconditional rights'.

4.3.3 Inter-generational equity (H1.3)

In Section 4.2.1 it was noted that H1.3 was accepted irrespective of the inclusion or exclusion of Canadian respondents. A detailed analysis of the results showed that the main areas of controversy were the inclusion of prospective information in the scope of financial reporting (SPN 12 and 13), the possibility of liabilities arising from non-exchange transactions (SPN 17 and 22.5) and the possibility of liabilities arising from 'non-legal binding obligations[19]' (SPN 22.4). Each of these areas of controversy will be discussed briefly in this section to identify specific isomorphic pressures and resistance to such pressures.

Prospective information

Eighty-five percent of accounting professionals were in favour of the inclusion of prospective information in the scope of financial reporting. Included in this number are all accounting professionals with an international presence. Only twenty-three percent of all government agencies (forty percent when excluding Canadian respondents) agreed. No Canadian government agencies supported the proposal.

The arguments provided by the respective stakeholder groups were insightful. Government agencies who were opposed to prospective information highlighted the following issues: (a) the information would be difficult or impossible to audit; (b) the qualitative characteristics cannot be applied to prospective information; (c) the IPSASB will have insufficient funding to address prospective information; (d) it will reduce the understandability of the financial statements; (e) it should be left to the discretion of local jurisdictions; and (f) it is beyond the scope of the IPSASB. One response from a Canadian respondent emphasises the scepticism with which Canadian government agencies view accounting professionals:

> 'External auditors have a tendency to interpret any such guidance as authoritative and prescriptive, creating difficulties for preparers of financial information to put a limit on such disclosures in their financial statements and related financial reports.' (Northwest Territories Finance (Canada), CP1)

[19] This was the term used in ED2. It was replaced by the correctly phrased term 'non-legally binding obligations' in the final version of the IPSASB CF (IPSASB, 2014a).

By contrast, accounting professionals who supported prospective information argued that it responds to the needs of users and will demonstrate sustainability and accountability for the impact of today's decisions on future resources. They did acknowledge certain matters that will need to be considered, including (a) the audit implications; (b) the applicability of qualitative characteristics; (c) the funding of the IPSASB; (d) only reporting prospective information that enhances the users' understanding of the financial statements and future service delivery; and (e) the possibility of the IPSASB only issuing non-authoritative guidance for prospective information. These matters for consideration are nearly perfectly parallel to the opposing arguments provided by government agencies in the previous paragraph. Accounting professionals are not viewing these problems as insurmountable in the way that government agencies are.

There is evidence of isomorphic pressure from accounting professionals to drive the reporting of prospective information. The comment letters submitted acknowledge almost all the concerns of government agencies but emphasise that they are not insurmountable. It is clear, however, that government agencies are particularly sceptical of the possibility of reporting prospective information in GPFRs. This resistance is strongest in, though not limited to, Canadian government agencies.

Liabilities arising from non-exchange transactions

Seventy-three percent of accounting professionals agreed that liabilities can arise from non-exchange transactions which would result in the recognition of more liabilities. Only fifty percent of government agencies held the same view. The difference is a result of a majority of Canadian government agencies who disagreed with this view. Canadian accounting professionals agreed with the view. This provides evidence of some isomorphic pressures from accounting professionals in Canada with their government agency counterparts resisting this pressure.

Liabilities arising from 'non-legal binding obligations'

ED2 proposed that liabilities can arise from 'non legal binding obligations'. Eighty-three percent of accounting professionals agreed with this proposal which would result in the recognition of more liabilities. All accounting professionals with an international presence supported the proposal. Only fifty-six percent of government agencies agreed with the proposal. A majority of Canadian government agencies supported the proposal. After adjusting for Canadian responses, only forty-three percent of government agencies agreed with the proposal. This provides evidence of isomorphic pressure being exerted, in general, by accounting professionals for a wider recognition of the obligations of governments and other public sector entities. Many government agencies are resisting this pressure.

In summary, under the theme of inter-generational equity, there is strong evidence of isomorphic pressures from accounting professionals with respect to prospective information and liability recognition from non-exchange transactions and non-legally binding obligations. Accounting professionals show strong NPM alignment in each of these areas. Canadian government agencies show strong resistance to prospective information and liability recognition from non-exchange transactions. Other government agencies show resistance to prospective information and liability recognition from 'non-legal binding obligations'.

4.3.4 Whole-of-government reporting (H1.4)

In Section 4.2.1 it was noted that H1.4 was accepted when including Canadian respondents but rejected when excluding Canadian respondents. There is a difference in the positions taken by Canadian government agencies and accounting professionals respectively (SPN 23 and 24). In the limited cases of Australia and Holland there was some evidence of resistance to whole-of-government reporting.

Canadian government agencies were vociferous in their disagreement with the proposals made by the IPSASB regarding the group reporting entity. They view their three tiers of government (federal, provincial/territorial and local) as independent of one another and therefore they should not and cannot, in the opinion of the respondents, be consolidated into one another. They felt that the IPSASB was being too prescriptive in its group reporting entity proposal such that it could override Constitutional frameworks. The separate consolidation of different tiers of government was considered by the researcher as being against the intention of whole-of-government reporting because it will not provide a complete picture of the Canadian government to allow for international comparability. It is noted that responses submitted by Canadian accounting professionals did not raise the same concern as their government agency counterparts.

A similar issue was raised by HoTARAC who were categorised as an Australian government agency. They noted that municipalities are not included in the State's whole-of-government reporting entity because they are recognised by the Constitution as being a separate and independent tier of government. The issue was not raised by any other Australian respondents. The Dutch Ministry of Finance (CP1) did not consider whole-of-government reporting to be realistic or appropriate. This is contrasted by the Danish Agency for Governmental Management who explained that they perform group reporting for Denmark as a whole.

There is strong evidence of resistance in Canada to comprehensive whole-of-government reporting that is seen to be supported by accounting professionals. To a lesser extent there may be resistance from some Australian government agencies as expressed by the members of HoTARAC. It was clear from the content analysis that despite general support for the concept of whole-of-government reporting, the actual practice varies from country to country. It was also clear that local Constitutional frameworks play a significant role in the way the group reporting entity is defined and are the main reasons used by government agencies to justify not defining the public sector in a country as a whole as one group reporting entity. Outside of the resistance from government agencies to the IPSASB CF attempting to overrule local Constitutional frameworks and the related question of the scope of a whole-of-government reporting entity, no isomorphic pressures were identified from accounting professionals.

4.3.5 Performance focused reporting (H1.5)

In Section 4.2.1 it was noted that H1.5 was rejected irrespective of the inclusion or exclusion of the Canadian respondents. This was primarily a result of the researcher including service delivery reporting (SPN 25 and 27) and compliance reporting (SPN 26 and 28) as contrasting indicators of performance focused reporting[20]. An overwhelming majority of respondents from both stakeholder groups either supported compliance reporting or did not express an explicit position, resulting in greater alignment of views overall for H1.5. Service delivery reporting proved to be a more controversial area and provided evidence of isomorphic pressure.

Seventy-nine percent of accounting professionals supported the IPSASB's proposal to include service delivery reporting in the scope of financial reporting. By contrast, only twenty-nine percent of government agencies supported the proposal (fifty percent when excluding Canadian respondents)[21]. All Canadian government agencies were opposed to the proposal while all Canadian accounting professionals supported the proposal. Canadian government agencies were particularly vociferous in their arguments against including service delivery reporting in the scope of the CF.

Arguments provided to support positions were similar to those expressed for prospective information (see Section 4.3.3). Government agencies gave the following main arguments against service delivery reporting: (a) it should not be audited; (b) it will be difficult or impossible to audit; (c) it should be left to the discretion of local jurisdictions; (d) it is beyond the scope of the IPSASB's mandate; and (e) it will reduce the understandability of the financial statements.

Accounting professionals who supported service delivery reporting considered the information to be of great importance in the public sector context. They noted auditing challenges and the IPSASB's funding as

[20] Compliance reporting was identified in Section 2.3.5 as being opposed to performance focused reporting and aligned to PPA. Service delivery reporting by contrast was identified as being evidence of performance focused reporting and aligned to NPM.
[21] As described in SPN 25, a view that service delivery reporting should be on a lower level to the financial statements (for example, unaudited or part of 'other information') was considered as being aligned to PPA.

matters to consider but did not view these challenges as being insurmountable. All responses from accounting professionals with an international presence supported the proposal.

This is an area where accounting professionals are exerting strong isomorphic pressure by supporting the IPSASB proposal to include service delivery reporting in the scope of financial reporting. There is a large amount of resistance from government agencies with respect to the broadened scope. The resistance is strongest in Canada but is prevalent in many other countries.

4.3.6 Summary

This Section has analysed the quantitative results described in Section 4.2.1 for H1 and its sub-hypotheses by considering the detailed qualitative findings from the content analysis. The quantitative and qualitative results are summarised in Table 9. In the next Section, the qualitative findings for H2 are analysed.

Table 9: Summary of quantitative and qualitative results for H1

Hypothesis		Quantitative result	Main qualitative observations
H1: The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.	***Including Canada***	***Accepted***	– Refer to details below
	Excluding Canada	***Accepted***	
H1.1 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Accepted	– Alignment between accounting professionals and government agencies in Australia and UK (mimetic isomorphism) – Opposition to 'decision usefulness' objective from Canadian government agencies – Canadian government agencies preferred income & expense-led approach (with strong arguments) and deferred inflows and outflows – Accounting professionals referred to IASB CF in arguments more than government agencies (normative/mimetic isomorphism) – Accounting professionals preferred asset & liability-led approach with strong arguments (normative isomorphism) – Both stakeholder groups (excl. Canada) were divided in their views on the deferred inflows and outflows subtheme. – International accounting professionals support private sector mimicry (normative isomorphism)
	Excluding Canada	Rejected	
H1.2 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– General agreement from both stakeholder groups for asset recognition – Canadian government agencies mostly opposed 'unconditional rights' whereas Canadian professional organisations supported 'unconditional rights' (limited normative isomorphism)
	Excluding Canada	Rejected	
H1.3 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'intergenerational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Accepted	– Accounting professionals show strong support for prospective information and liability recognition from non-exchange transactions or non-legal obligations (normative isomorphism). – Canadian government agencies opposed prospective information and liability recognition from non-exchange transactions – Other government agencies opposed prospective information and non-legal obligations
	Excluding Canada	Accepted	
H1.4 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Accepted	– Canadian government agencies were strongly opposed to consolidating different tiers of government into one whole-of-government report – Other respondents showed majority support for whole-of-government reporting (limited isomorphism)
	Excluding Canada	Rejected	
H1.5 The content of comment letters submitted by accounting professionals during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– Majority support for all stakeholder groups for compliance reporting, showing PPA alignment – All Canadian government agencies were strongly against service delivery reporting being in-scope while all Canadian accounting professionals supported this proposal – Stronger support for service delivery reporting being in-scope from non-Canadian accounting professionals compared to non-Canadian government agencies (normative isomorphism)
	Excluding Canada	Rejected	

4.4 Qualitative analysis – H2

As was explained in Section 4.2.2, international organisations did not take as many explicit positions on relevant issues as had been expected. This limited the evidence produced by the quantitative results. H2 and all its sub-hypotheses were rejected. This Section will consider the qualitative observations made by the researcher during the content analysis that were identified as being relevant to an understanding of any isomorphism being exerted by international organisations.

United Nations Systems provided the most comment letters of any international organisation, submitting letters for every phase of the project. Their participation showed lobbying activity that was mostly aligned to its interest as a preparer of GPFRs and not exerting influence over the process for broader, international policy reasons. The only exception to this was in their commenting under the theme of inter-generational equity. They express a preference for the CF to avoid liability recognition being overly broad as this will make the CF too controversial. It was also noticeable that United Nations Systems did not support service delivery reporting. These two positions can be interpreted as showing a preference for a less controversial CF that encourages wider adoption of the IPSAS. It is, however, too limited to result in a conclusion on the existence of isomorphism on the part of international organisations.

International organisations broadly supported private sector mimicry. H2.1 was the sub-hypothesis that showed the lowest p-value of all the H2 sub-hypotheses (0.304). Although this was not statistically significant enough to accept H2.1, there was an alignment from international organisations to NPM under the private sector mimicry theme. The European Commission only submitted a letter in response to ED2. Its primary concern was the identification of deferred inflows and deferred outflows as elements (see SPN 7). They were strongly opposed to this issue. There is, therefore, some evidence of support from international organisations for the theme of private sector mimicry but there was not enough evidence to classify this support as coercive or normative isomorphism.

The IMF dedicated its entire comment letter in response to ED1 to the issue of whole-of-government reporting. They expressed a strong concern that the proposed CF would allow governments to exclude entities from their whole-of-government reporting entity by simply passing legislation. They explain that this may be done so as to exclude entities with significant liabilities or contingent liabilities, thereby artificially improving the financial position of the whole-of-government reporting entity. They are concerned that the proposed CF 'would not advance the cause of comprehensive financial reporting about a particular level of government.' They want the CF to provide less flexibility to jurisdictions when deciding on which entities to consolidate because such flexibility

> 'could help perpetuate the current disparity in practices under which financial statements often fail to provide a comprehensive view of the public finances and also lack international comparability.' (IMF, ED1)

The letter is, therefore, considered to be strongly supporting an NPM stance with respect to whole-of-government reporting. It is however noted that their reference in the first quote above to 'comprehensive financial reporting about a particular level of government' suggests they may be in agreement with the views of the Canadian government agencies (see Section 4.3.4). The letter is best described as showing evidence of normative isomorphism because of the theoretical nature of the arguments.

In summary, there was not sufficient evidence to support H2 and its sub-hypotheses outright. There is some suggestion that there may be limited isomorphic pressures under the themes of private sector mimicry and whole-of-government reporting but these are more normative than coercive. The findings of this Section are summarised in Table 10.

Table 10: Summary of quantitative and qualitative results for H2

Hypothesis		**Quantitative result**	**Main qualitative observations**
H2: The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by government agencies.	***Including Canada***	***Rejected***	– United Nations Systems comments were mostly focused on ensuring the CF was relevant to non-governmental entities
	Excluding Canada	***Rejected***	
H2.1 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'private sector mimicry' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– All but one response from international organisations were for NPM or neutral. – The European Commission noted their disagreement with deferred inflows and outflows for conceptual and practical reasons
	Excluding Canada	Rejected	
H2.2 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'asset recognition' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– Responses closely aligned to government agencies – No additional qualitative findings
	Excluding Canada	Rejected	
H2.3 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'intergenerational equity' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– Comments on liabilities by United Nations Systems suggest a preference for avoiding the number of controversial issues in the CF
	Excluding Canada	Rejected	
H2.4 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'whole-of-government' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– IMF showed very strong support for whole-of-government reporting
	Excluding Canada	Rejected	
H2.5 The content of comment letters submitted by international organisations during the IPSASB CF process is associated with the 'performance focused reporting' theme to a greater extent than the content of the comment letters submitted by government agencies.	Including Canada	Rejected	– United Nations Systems did not support service delivery reporting
	Excluding Canada	Rejected	

Chapter V – Conclusions and recommendations

In this chapter conclusions for the study are described and recommendations proposed. In Section 5.1, the results are discussed and conclusions drawn out. The conclusions are discussed in the context of the isomorphic pressures described in Section 2.4. In Section 5.2 recommendations are made for the IPSASB and the respective stakeholder groups together with suggestions for further research.

5.1 Discussion of findings

In this sub-section, the findings described in Chapter 4 will be analysed more closely from the perspective of new institutionalism in order to reach conclusions. The findings will be discussed from the perspective of accounting professionals, government agencies and finally international organisations. In the final sub-section, overall conclusions will be made.

5.1.1 The role of accounting professionals in driving normative and mimetic isomorphism

The hypothesis H1 was accepted at an overall level irrespective of the inclusion or exclusion of Canadian respondents.

The arguments provided by accounting professionals showed evidence of normative isomorphism by focusing on conceptual and theoretical considerations. They did not ignore practical implications but did not view such implications as insurmountable (for example, see the discussions on prospective information in Section 4.3.3 and service delivery information in Section 4.3.5). There was a consistent theme of accounting professionals seeking alignment with the IASB CF except in cases where there was a public sector specific issue (Section 4.3.1). This suggests that accounting professionals are emphasising the benefits of private sector mimicry which suggests the operation of mimetic isomorphic pressures.

Accounting professionals showed support for inter-generational equity concepts which would result in broader reporting requirements and an increased identification of liabilities and commitments (see Section 4.3.3). They were resistant to areas where government agencies noted public sector specific issues when these issues would result in greater alignment to PPA. For example, special treatment of 'non-legal binding obligations' and non-exchange transactions was not supported because it would lead to a reduction in the number of liabilities identified. These recommendations provide evidence of normative isomorphism through the support of the NPM ideal of expanded accountability as described in Section 2.2.

Accounting professionals showed particularly strong support for prospective information, compliance reporting and service delivery reporting. This support was strongest from accounting professionals with an international presence. An increased scope in financial reporting will result in an increase in the revenue-earning potential for accounting professionals, particularly through an increase in audit requirements. This assumption is supported by multiple comment letters from accounting professionals that acknowledged the audit implications[22] and by letters from government agencies who were weary of the audit implications (see Sections 4.3.3 and 4.3.5). Although sound theoretical arguments were provided for the increased scope, it is difficult to overlook the self-interest of accounting professionals for these issues arising from this increased revenue-earning potential (see Section 2.4). They were open in their comment letters about the challenges that were likely to be encountered in reporting on prospective and service delivery information. Their emphasis here was, nonetheless, different to government agencies. For example, difficulties in auditing such information were articulated as obstacles to overcome. This is in sharp contrast to many government agencies which used these obstacles as a justification for not expanding the scope of financial reporting. In this way the underlying self-interests of the accounting professionals offer evidence of normative isomorphic pressure being exerted by these respondents during phase 1 and phase 2 of the conceptual framework project.

[22] For example, in KPMG's response to ED1 they recommended that the IPSASB work with the IAASB to ensure they provide suitable criteria to measure the subject matter against. This would help to ensure that the expanded scope is auditable.

Accounting professionals and government agencies from Australia and Canada and the United Kingdom submitted a large number of comment letters (see Section 4.1.2). This allows for conclusions to be made for each of these countries. Accounting professionals from Australia and the United Kingdom showed a greater alignment to NPM themes than other countries showing evidence that institutional change has occurred. They highlighted issues like sector and transaction neutrality and a wider scope for the identification of assets and liabilities. It was noticeable that government agencies from these countries held similar views. Both countries are early adopters of NPM financial reforms (English et al., 2005; Humphrey et al., 2005; Wynne, 2008), with both countries applying adapted IFRS standards in their public sector (Aggestam et al., 2013). The comment letters analysed in this study show that isomorphic pressures have resulted in institutional change in these regions.

Canadian accounting professionals showed a greater alignment to NPM themes than Canadian government agencies. The large number of responses from Canadian government agencies and the extent of arguments provided to support their positions provides evidence that there is significant resistance to NPM accounting reforms in Canada. Normative isomorphic pressures do not appear to have resulted in a change in the institutional views of these government agencies. This reduces the likelihood of the adoption in Canada of the IPSAS CF and threatens the legitimacy of the IPSASB in Canada (ironically, the country where the IPSASB is based). Accounting professionals are, nonetheless, continuing to exert normative isomorphic pressures to encourage changes in accounting practice in Canada.

In this research, accounting professionals were found to show greater preference for the doctrines of NPM than government agencies and it is concluded that isomorphic pressures are being exerted mainly by accounting professionals. The motivation of accounting professionals appears to be primarily normative and closely linked to the fact that their own interests would be best served by a NPM approach to reporting in the public sector. Many of the views taken by accounting professionals, in particular on the expanded scope proposed in the CF consultation documents, are views that will yield financial benefits for the accounting profession. The resistance of some government agencies as outlined in the next section suggests that the perceived motivation behind these views will remain an area of controversy.

5.1.2 Resistance of government agencies to isomorphic pressures

The overall support rate of government agencies for NPM was 42%, compared to 35% support for PPA (see Table 5). These results were heavily influenced by Canadian government agencies who expressed views that closely aligned to PPA. After removing Canadian responses, the overall support rate of government agencies for NPM was 50% compared to 28% for PPA (see Table 5).

There were many areas where the views of government agencies aligned with those of the accounting professionals in support of NPM principles. These included the evolution of financial reporting in response to the needs of users (SPN 2), qualitative characteristics of financial reporting (SPN 3 and 5), asset recognition (see Section 4.3.2), the incorporation of performance obligations or service potential in the asset and liability definitions (SPN 14 and 22.3) and the role of sovereign power (SPN 21 and 22.6). There is a degree of acceptance from government agencies of institutional change in accounting report that is aligned to NPM principles.

By contrast, for issues such as 'unconditional rights' (see Section 4.3.2) and the treatment of 'non-legal binding obligations' and liabilities arising from non-exchange transactions (see Section 4.3.3), they tended to hold positions that would results in fewer assets and liabilities being recognised. In some cases, respondents specifically highlighted types of assets and liabilities that they did not believe should be recognised in the financial statements. There is resistance in these areas by government agencies to mimetic and normative isomorphic pressures.

The arguments provided by government agencies in support of PPA showed a specific resistance to the changes being proposed by the IPSASB and supported by accounting professionals. The arguments were generally not grounded in conceptual principles. They tended to focus on issues such as the mandate and funding of the IPSASB, the role and influence of auditors and the need for local jurisdictional discretion. The resistance was strongest in areas where public servants would be required to perform more work and

be subjected to wider accountability, for example through the proposals for prospective reporting, service delivery reporting and whole-of-government reporting. There were many comments that emphasised the role of compliance with the budget as being the primary accountability consideration in the public sector. This provides evidence of resistance to normative isomorphic pressures on the basis of practical implications.

The evidence of resistance to change was strongest from Canadian government agencies. Other government agencies were more mixed in their alignment to NPM, and were less vociferous in their arguments against NPM-linked proposals.

On average, government agencies referred less to the IASB CF as a basis for their comments than accounting professionals did (see Section 4.3.1). Government agencies from Australia and Canada were an exception to this observation (as explained in Section 5.1.2), but other countries tended to not use the IASB CF as a basis for their positions. There is only limited evidence of mimetic isomorphism influencing government agencies outside of Australia and the United Kingdom with many government agencies continuing to show scepticism towards the introduction of private sector accounting practices into the public sector.

In summary, many government agencies are still resistant to the isomorphic pressures driving NPM accounting reforms, particularly where these reforms will result in wider reporting and accountability. They are also sceptical of applicability of some private sector accounting practices to the public sector, limiting the effect of mimetic isomorphism. The research found that the resistance was significantly stronger in Canada than in other parts of the world.

5.1.3 The limited isomorphic role of international organisations

The limited explicit positions taken by international organisations in their letters severely hampered the ability of the researcher to draw conclusions for H2 and its sub-hypotheses. H2 and it sub-hypothesis were all rejected, indicating that the views of international organisations are not associated with the doctrines of NPM to a greater extent than government agencies. There are no observed isomorphic pressures exerted by international organisations on government agencies through the IPSASB CF comment letter process. There are, however, some limited qualitative observations that can be made based on the comment letters that were submitted by international organisations.

Firstly, the organisations are interested in how the IPSAS CF will impact their own financial reporting. United Nations Systems, in particular, commented primarily from the perspective of a preparer of GPFRs and even showed some resistance to the proposal of including service delivery information in the scope of financial reporting. This shows that the organisation is resisting isomorphic pressures that will change their reporting requirements rather than seeking to add to the isomorphic pressures to reform financial reporting in public sectors around the world.

Secondly, the IMF made clear in their ED1 comment letter that they view whole-of-government reporting as being very important. They strongly disagreed with the allowance in ED2 for an element of local jurisdictional discretion with respect to whole-of-government reporting. This was in direct opposition to the views expressed by many government agencies and even some accounting professionals. On its own, this did not provide evidence of coercive isomorphism but it did show that the IMF sees a benefit in comparable whole-of-government reports. This can be regarded as evidence of limited normative isomorphism from the IMF with respect to whole-of-government reporting only.

Thirdly, there was some limited evidence of international organisations supporting a more palatable, less controversial CF. This observation hints at the possibility that international organisations are more

interested in a widely adopted IPSAS rather than an IPSAS that ticks all the boxes of an NPM agenda. The evidence was insufficient to support the identification of any tangible isomorphic effects.

The points raised above should not be taken as conclusions of this study but rather observations from the limited evidence that was available for international organisations. At an overall level, the limited responses from international organisations does provide evidence that this stakeholder group is not using the IPSASB comment letter processes as an opportunity to lobby for a framework that is aligned to their objectives. No evidence was found of the coercive isomorphism that was highlighted in the literature (see Section 2.4). It is possible that they are exerting their influence on the IPSASB through other channels but this research did not identify any specific evidence to support this.

5.1.4 Other observations

This sub-section highlights additional observations that are not directly related to the research problem and hypotheses. They did, however, impact on the ability of the researcher to understand the positions of a broad range of stakeholders and consequently will impact on the ability of the IPSASB to understand the needs of their stakeholders.

The low response rate from developing countries (see Section 4.1) made it difficult to draw any conclusions on the isomorphic pressures being exerted in the developing world. The lack of participation of government agencies from developing nations may be indicative of their resistance to the isomorphic pressures to adopt accrual based standards such as the IPSAS (Adhikari et al., 2013; Bezes et al., 2012) or of their submission to mimetic isomorphism by favouring the NPM accounting ideals that are supported by accounting professionals in these countries (Adhikari et al., 2013; Oulasvirta, 2014). It is not possible to assess their actual positions in this study due to their non-participation in the comment letter process. The general lack of participation from developing countries threatens the legitimacy of the CF, the IPSAS in general and the IPSASB (Larson, 2007; Larson & Herz, 2013). It is expected that the adoption of the IPSAS in developing

countries may be hamstrung by resistance from government agencies if their concerns have not been addressed in the final version of the CF. The effect of this could, however, be offset by coercive isomorphic pressures from international organisations (Adhikari et al., 2013; Oulasvirta, 2014) although little evidence of this was obtained through this research (see Section 5.1.3).

A similar issue arises from the drop-off in the number of government agencies responding to phase 2 of the project, especially ED2. Only nine responses were submitted by government agencies. The reasons for this are not apparent from the available data. It is possible that the proposals in phase 2 were not considered to be as controversial for government agencies as the proposals in phase 1. This is a plausible argument because the most controversial issue in ED2 was the inclusion of deferred inflows and deferred outflows as elements (EY, 2014), a PPA aligned proposal. This sought to address public sector specific issues such as multi-year grants and non-exchange transactions and was seen by several accounting professionals as providing greater flexibility to preparers. By contrast, phase 1 dealt with issues such as the scope of financial reporting and whole-of-government reporting which proved to be far more controversial for government agencies (see Sections 4.3.3, 4.3.4 and 4.3.5). It is also possible that government agencies were disgruntled by their views expressed in earlier phases not being taken into account. This is an aspect that would require further research to determine if it plausible.

If the latter reason is true it threatens the legitimacy of the IPSASB. If there is not sufficient support from government agencies for the CF and the IPSAS in general, adoption of the IPSAS is likely to be resisted by governments. This may, however, be mitigated by the normative isomorphic pressures exerted by accounting professionals discussed in Section 5.1.1.

5.1.5 Overall conclusions

The content of comment letters submitted by accounting professionals during the IPSASB CF process was associated with the doctrines of NPM to a greater extent than the content of comment letters submitted by

government agencies. This difference in association was strongest in Canada but weakest in Australia and the United Kingdom. Accounting professionals were seen to be motivated by normative and mimetic isomorphism to bring about institutional change in public sector accounting particularly under the themes of private sector mimicry, inter-generational equity and performance focused reporting. They are, however, strongly encouraged to lobby for these changes by their own self-interest.

Government agencies showed a level of resistance to change. Outside of Australia and the United Kingdom they were less inclined to mimic practices from the private sector and were particularly resistant to proposals that would expand their work load and accountability. The resistance to change was by far strongest in Canada and was evidenced by the number of comment letters submitted and the extent of arguments provided. Similar to accounting professionals, their own self-interest reduced the level to which they were influenced by isomorphic pressures because of the increased accountability and workload of many NPM accounting reforms.

No specific conclusions could be drawn for international organisations other than the fact that international organisations are generally not using the IPSASB's comment letter process as an opportunity to lobby for their own interests. No evidence was identified of coercive isomorphic pressures being exerted by international organisations.

In the next and final section of this thesis, recommendations are made in response to the conclusions reached in this section. Recommendations for further research will also be proposed.

5.2 Recommendations

5.2.1 Recommendations in response to the conclusions

The research identified a resistance by government agencies to normative and mimetic isomorphic pressures that are encouraged by accounting professionals. It is recommended that local standard setters and accounting professionals encourage ongoing dialogue with government agencies in their respective countries. While it is inevitable that there will be areas where views diverge, standard setters are uniquely positioned to find reasonable middle ground between stakeholder groups to encourage adoption of new frameworks and standards.

Accounting professionals who join government agencies from the private sector should work hard to understand the public sector context and apply their mind to where differences exist between the sectors. The recently published IPSASB CF and in particular its preface (IPSASB, 2014a) provide a useful starting point for understanding the conceptual differences between the sectors. Greater involvement of accounting professionals in the public sector who understand the unique context of the sector will help to direct isomorphic forces to areas that will result in impactful reform.

This research identified as a concern the limited number of government agencies participating in the CF comment letter process, particularly from developing countries. It is important that the IPSASB works hard to obtain inputs from a broader range of stakeholders, including those from government agencies in developing nations. Similarly, it would be beneficial for the IPSASB to encourage more comment letters to be submitted by international organisations as their participation gives greater legitimacy to the process.

International organisations who have an interest in financial reporting in the public sector and the work of the IPSASB should likewise take the initiative to participate in these processes to ensure that their interests and objectives are considered. While the active participation of United Nations Systems was noted, their participation primarily represented their views as preparers of GPFRs under the IPSAS Framework. It

would be invaluable to the standard setting process to have the broader perspective of international organisations represented on the expected impact of proposed accounting frameworks and standards in public sectors around the world.

5.2.2 Areas for further research

There are several areas where this research could be taken further. Firstly, the analysis could be taken further by gathering data on a country-by-country basis. Such a study would help to identify areas applicable to specific countries and would provide useful information to local standard setters. Additional data from the consultation processes of local standard setters could assist in this process. Such a study could also seek to understand the reasons for variations in the level of participation of specific countries in the IPSASB consultation processes. Secondly, the research could be extended to other phases of the CF project, in particular the phase on measurement which can be analysed under the NPM theme of marketisation.

Thirdly, it would be beneficial to compare the positions and arguments taken by the respective stakeholder groups to the final positions taken in the published CF to ascertain if preference is being given to any stakeholder groups (similar to the study performed by Kwok and Sharp (2005)). Fourthly, the data used to represent the views of international organisations could be extended by analysing other relevant documentation published by these organisations. This would help to identify any coercive isomorphism being exerted by these organisations. It may also help to determine reasons for the low response rates from the international organisations in the comment letter process.

Finally, in the absence of comment letters from government agencies in developing countries, other methods, such as surveys and interviews, could be used to assess the alignment to PPA or NPM of government agencies in these countries.

Reference list

Adhikari, P., Kuruppu, C., & Matilal, S. (2013). *Dissemination and institutionalization of public sector accounting reforms in less developed countries: A comparative study of the Nepalese and Sri Lankan central governments.* Paper presented at the Accounting Forum.

Aggestam, C., Brusca, I., & Chow, D. (2013). Constructing a European governance space: The case of harmonised Public Sector Accounting Standards for European Union Member States. from http://openarchive.cbs.dk/bitstream/handle/10398/8919/Aggestam%20et%20al.pdf?sequence=1

Arnaboldi, M., & Lapsley, I. (2009). On the implementation of accrual accounting: a study of conflict and ambiguity. *European Accounting Review, 18*(4), 809-836.

Bergmann, A. (2012). The influence of the nature of government accounting and reporting in decision-making: evidence from Switzerland. *Public Money & Management, 32*(1), 15-20.

Bezes, P., Demazière, D., Le Bianic, T., Paradeise, C., Normand, R., Benamouzig, D., . . . Evetts, J. (2012). New public management and professionals in the public sector. What new patterns beyond opposition? *Sociologie du travail, 54*, e1-e52.

Bisogno, M., Santis, S., & Tommasetti, A. (2015). Public-Sector Consolidated Financial Statements: An Analysis of the Comment Letters on IPSASB's Exposure Draft No. 49. *International Journal of Public Administration, 38*(4).

Blöndal, J. R. (2003). Accrual Accounting and Budgeting. *OECD Journal on Budgeting, 3*(1), 43-59.

Blume, L., & Voigt, S. (2011). Does organizational design of supreme audit institutions matter? A cross-country assessment. *European Journal of Political Economy, 27*(2), 215-229.

Brown, L. D., & Feroz, E. H. (1992). Does the FASB listen to corporations? *Journal of business finance & accounting, 19*(5), 715-731.

Carruthers, B. G. (1995). Accounting, ambiguity, and the new institutionalism. *Accounting, organizations and society, 20*(4), 313-328.

Carvalho, C. D. F. d. M., de Albuquerque, F. H. F., Quirós, J. T., & Justino, M. d. R. F. (2015). An Analysis Of Cultural Differences Based On The Replacement Project Of IAS 39: Financial Instruments – Recognition And Measurement. *Journal of Education and Research in Accounting, 9*(1), 5-24.

Chan, J. L. (2003). Government accounting: an assessment of theory, purposes and standards. *Public Money & Management, 23*(1), 13-20.

Chatham, M. D., Larson, R. K., & Vietze, A. (2010). Issues affecting the development of an international accounting standard on financial instruments. *Advances in Accounting, 26*(1), 97-107.

Christensen, T., Lie, A., & Lægreid, P. (2008). Beyond new public management: agencification and regulatory reform in Norway. *Financial Accountability & Management, 24*(1), 15-30.

Christiaens, J., Reyniers, B., & Rollé, C. (2010). Impact of IPSAS on reforming governmental financial information systems: a comparative study. *International Review of Administrative Sciences, 76*(3), 537-554.

Christiaens, J., & Rommel, J. (2008). Accrual accounting reforms: only for businesslike (parts of) governments. *Financial Accountability & Management, 24*(1), 59-75.

Cooper, D. J., & Ogata, K. (2005). New public management reforms in Canada: Success or failure. In J. Guthrie, C. Humphrey, L. Jones & O. Olson (Eds.), *International public financial management reform: progress contradictions, and challenges*. Greenwich, Connecticut, USA: Information Age Publishing.

Creswell, J. W., & Planco Clark, V. L. (2011). *Designing and conducting mixed methods research* (2nd ed.). California, USA: SAGE Publications.

DiMaggio, P. J., & Powell, W. W. (1983). The iron cage revisited: Institutional isomorphism and collective rationality in organizational fields. *American Sociological Review, 48*(2), 147-160.

Dunleavy, P., & Hood, C. (1994). From old public administration to new public management. *Public Money & Management, 14*(3), 9-16.

Dunleavy, P., Margetts, H., Bastow, S., & Tinkler, J. (2006). New public management is dead—long live digital-era governance. *Journal of public administration research and theory, 16*(3), 467-494.

Ellwood, S., & Newberry, S. (2007). Public sector accrual accounting: institutionalising neo-liberal principles? *Accounting, Auditing & Accountability Journal, 20*(4), 549-573.
English, L. M., Guthrie, J., & Parker, L. D. (2005). Recent public sector financial management change in Australia: Implementing the market model. In J. Guthrie, C. Humphrey, L. Jones & O. Olson (Eds.), *International public financial management reform: progress contradictions, and challenges*. Greenwich, Connecticut, USA: Information Age Publishing.
EY. (2014). IPSAS Outlook - November 2014: EY.
Funnel, W., Cooper, K., & Lee, J. (2012). *Public sector accounting and accountability* (2nd ed.). Sydney, Australia: NewSouth Publishing.
Giner, B., & Arce, M. (2012). Lobbying on accounting standards: Evidence from IFRS 2 on share-based payments. *European Accounting Review, 21*(4), 655-691.
Gray, A., & Jenkins, B. (1995). From public administration to public management: reassessing a revolution? *Public administration, 73*(1), 75-99.
Groot, T., & Budding, T. (2008). New public management's current issues and future prospects. *Financial Accountability & Management, 24*(1), 1-13.
Guthrie, J. (1998). Application of accrual accounting in the Australian public sector–rhetoric or reality. *Financial Accountability & Management, 14*(1), 1-19.
Guthrie, J., Olson, O., & Humphrey, C. (1999). Debating developments in new public financial management: the limits of global theorising and some new ways forward. *Financial Accountability & Management, 15*(3-4), 209-228.
Heald, D., & Dowdall, A. (1999). Capital charging as a VFM tool in public services. *Financial Accountability & Management, 15*(3-4), 209-228.
Hodges, R., & Mellett, H. (1999). Accounting for the private finance initiative in the United Kingdom national health service. *Financial Accountability & Management, 15*(3-4), 275-290.
Holder, A. D., Karim, K. E., Lin, K. J., & Woods, M. (2013). A content analysis of the comment letters to the FASB and IASB: Accounting for contingencies. *Advances in Accounting, 29*(1), 134-153.
Hood, C. (1991). A public management for all seasons? *Public administration, 69*(1), 3-19.
Hood, C. (1995). The "New Public Management" in the 1980s: variations on a theme. *Accounting, organizations and society, 20*(2), 93-109.
Hopwood, A. (1984; 1994). Accounting and the pursuit of efficiency. In D. McKevitt & A. Lawton (Eds.), *Public sector management: theory, critique and practice*. London: SAGE. (Reprinted from: Issues in public sector accounting, pp. 167-87. by A.G. Hopwood & C. Tomkins, Eds., 1984, Philip Allan: Oxford (abridged)).
Hopwood, A. (1987). The archeology of accounting systems. *Accounting, organizations and society, 12*(3), 207-234.
Humphrey, C., Guthrie, J., Jones, L., & Olson, O. (2005). The Dynamics of public financial management change in an international context: progress or a progression of questions, contradictions and challenges? In J. Guthrie, C. Humphrey, L. Jones & O. Olson (Eds.), *International public financial management reform: progress contradictions, and challenges*. Greenwich, Connecticut, USA: Information Age Publishing.
Humphrey, C., & Miller, P. (2012). Rethinking impact and redefining responsibility: The parameters and coordinates of accounting and public management reforms. *Accounting, Auditing & Accountability Journal, 25*(2), 295-327.
IASB. (2010). *Conceptual Framework for Financial Reporting*. IFRS Foundation.
IPSASB. (2009). *Consultation paper: Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: The Objectives of Financial Reporting; The Scope of Financial Reporting; The Qualitative Characteristics of Information Included in General Purpose Financial Reports; The Reporting Entity*. New York: IFAC Retrieved from http://www.ifac.org/system/files/publications/exposure-drafts/00298.pdf.
IPSASB. (2010a). *Conceptual Framework Exposure Draft 1: Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Role, Authority and Scope; Objectives and Users; Qualitative Characteristics; and Reporting Entity*. New York: IFAC Retrieved from http://www.ifac.org/system/files/publications/exposure-drafts/IPSASB-ED_Conceptual_Framework_Phase_1.pdf.
IPSASB. (2010b). *Consultation paper: Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Elements and Recognition in Financial Statements*. New York: IFAC

Retrieved from http://www.ifac.org/system/files/publications/exposure-drafts/IPSASB-CP_Elements-Recognition-Phase_2.pdf.
IPSASB. (2012). *Conceptual Framework Exposure Draft 2: Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Elements and Recognition in Financial Statements*. New York: IFAC Retrieved from http://www.ifac.org/system/files/publications/files/Conceptual%20Framework%20Exposure%20Draft%202%20FINAL%20November%208,%202012.pdf.
IPSASB. (2014a). *The Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities*. New York: IFAC.
IPSASB. (2014b). IPSASB Publishes Public Sector Conceptual Framework. Retrieved 25 May 2015, 2015, from http://www.ifac.org/news-events/2014-10/ipsasb-publishes-public-sector-conceptual-framework
IPSASB. (n.d.-a). International Public Sector Standards Board home page. Retrieved 31 May 2015, from http://www.ipsasb.org/
IPSASB. (n.d.-b). Public sector conceptual framework: project status. Retrieved 30 May 2015, 2015, from http://www.ipsasb.org/projects/public-sector-conceptual-framework
IRBA. (2012). *Guidance for auditing in the public sector*. Johannesburg: Independent Regulatory Board for Auditors Retrieved from http://www.paab.co.za/index.php/component/docman/doc_download/1246.
Khan, A., & Mayes, S. (2009). Transition to accrual accounting: International Monetary Fund.
Krishnan, S. (2011). 2 key assumptions to be aware of before applying the chi-square test. Retrieved from http://www.simafore.com/blog/bid/56480/2-key-assumptions-to-be-aware-of-before-applying-the-chi-square-test
Kwok, W. C. C., & Sharp, D. (2005). Power and international accounting standard setting: Evidence from segment reporting and intangible assets projects. *Accounting, Auditing & Accountability Journal, 18*(1), 74-99.
Lapsley, I. (1999). Accounting and the new public management: instruments of substantive efficiency or a rationalising modernity? *Financial Accountability & Management, 15*(3-4), 201-207.
Lapsley, I. (2008). The NPM agenda: back to the future. *Financial Accountability & Management, 24*(1), 77-96.
Lapsley, I., Mussari, R., & Paulsson, G. (2009). On the adoption of accrual accounting in the public sector: a self-evident and problematic reform.
Larson, R. K. (2007). Constituent participation and the IASB's international financial reporting interpretations committee. *Accounting in Europe, 4*(2), 207-254.
Larson, R. K., & Herz, P. J. (2013). A multi-issue/multi-period analysis of the geographic diversity of IASB comment letter participation. *Accounting in Europe, 10*(1), 99-151.
Laughlin, R. (2012). Debate: Accrual accounting: information for accountability or decision usefulness? *Public Money & Management, 32*(1), 45-46.
Leedy, P. D., & Ormrod, J. E. (2010). *Practical research: planing and design* (9th ed.). New Jersey, USA: Pearson Education.
Mautz, R. K. (1988). Monuments, mistakes and opportunities. *Accounting Horizons, 2*(2), 123-128.
Mayston, D. J. (1999). The private finance initiative in the national health service: an unhealthy development in new public management? *Financial Accountability & Management, 15*(3-4), 249-274.
Miller, H. T. (1994). Post-progressive public administration: Lessons from policy networks. *Public Administration Review*, 378-386.
O'Flynn, J. (2007). From new public management to public value: Paradigmatic change and managerial implications. *Australian journal of public administration, 66*(3), 353-366.
Oulasvirta, L. (2014). The reluctance of a developed country to choose International Public Sector Accounting Standards of the IFAC. A critical case study. *Critical Perspectives on Accounting, 25*(3), 272-285.
Pallot, J. (1990). The nature of public assets: a response to Mautz. *Accounting Horizons, 4*(2), 79.
Ravenscroft, S., & Williams, P. F. (2009). Making imaginary worlds real: The case of expensing employee stock options. *Accounting, organizations and society, 34*(6), 770-786.
Saemann, G. (1999). An Examination of Comment Letters Filed in the US Financial Accounting Standard-Setting Process by Institutional Interest Groups. *Abacus, 35*(1), 1-28.

Sanderson, I., & van Schaik, F. (2008). IPSAS: Improving accountability across the world. *Accountancy SA, October 2008*.
Stapenhurst, R., & Titsworth, J. (2001). Features and functions of supreme audit institutions. *Prem notes #59*. http://siteresources.worldbank.org/INTLAWJUSTINST/Resources/premnote59.pdf
Stoker, G. (2006). Public value management a new narrative for networked governance? *The American review of public administration, 36*(1), 41-57.
Ter Bogt, H. J. (2008). Recent and future management changes in local government: Continuing focus on rationality and efficiency? *Financial Accountability & Management, 24*(1), 31-57.
UN. (2016). *World economic situations and prospects*. New York: United Nations Retrieved from http://www.un.org/en/development/desa/policy/wesp/wesp_current/2016wesp_full_en.pdf.
Watts, R. L., & Zimmerman, J. L. (1978). Towards a positive theory of the determination of accounting standards. *Accounting review*, 112-134.
Whittington, G. (2008). Fair value and the IASB/FASB conceptual framework project: an alternative view. *Abacus, 44*(2), 139-168.
World Bank. (2011). *Botswana - Accrual Accounting Policy Note and Guide*. Washington, DC: World Bank Retrieved from https://openknowledge.worldbank.org/handle/10986/12322
Wynne, A. (2008). Accrual accounting for the public sector–a fad that has had its day. *International Journal on Governmental Financial Management, 8*(2), 117-132.
Yen, A. C., Hirst, D. E., & Hopkins, P. E. (2007). A content analysis of the comprehensive income exposure draft comment letters. *Research in Accounting Regulation, 19*, 53-79.

Appendix A – Scoring plan

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
	Private sector mimicry (Section 2.3.1)			
1	Phase One – Consultation paper PV 4	The objectives of financial reporting by public sector entities are to provide information about the reporting entity useful to users of GPFRs for: accountability purposes; and making resource allocation, political and social decisions (IPSASB, 2009).	Respondent disagrees with the preliminary view and holds the view that only accountability should be an objective of financial reporting. OR Respondent disagrees with the preliminary views and holds the view that accountability should be the primary objective (decision usefulness is secondary).	Respondent agrees with the preliminary view that both accountability and decision-usefulness are objectives of financial reporting. OR Respondent disagrees with the preliminary view and holds the view that only decision-usefulness should be an objective of financial reporting.
2	Phase One – Consultation paper PV 6	The scope of financial reporting should evolve in response to users' information needs, consistent with the objectives of financial reporting. (IPSASB, 2009)	The respondent disagrees that financial reporting should evolve in response to user needs.	The respondent agrees that financial reporting should evolve in response to user needs.
3.1	Phase One – Consultation paper PV 7	The qualitative characteristics of information included in GPFRs of public sector entities are: relevance, which encompasses confirmatory value, predictive value, or both; faithful representation, which is attained when depiction of economic or other phenomena is complete, neutral, and free from material error; understandability; timeliness; comparability; and verifiability (including supportability). Constraints on financial reporting are materiality, cost, and achieving an appropriate balance between the qualitative characteristics. (IPSASB, 2009)	3.1 Inclusion of faithful representation as a qualitative characteristic instead of reliability	3.1 Inclusion of faithful representation as a qualitative characteristic instead of reliability
3.2	Phase One – Consultation paper PV 7		3.2 The inclusion of predictive value as part of the relevance characteristic	3.2 The inclusion of predictive value as part of the relevance characteristic
3.3	Phase One – Consultation paper PV 7		3.3 The exclusion of prudence as a qualitative characteristic	3.3 The exclusion of prudence as a qualitative characteristic
4	Phase One –	Objectives of financial reporting by public sector entities and	Respondent disagrees with the ED	Respondent agrees with the ED

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
	Exposure draft MfC 2	the primary users of GPFRs of public sector entities and their information needs (IPSASB, 2010a)	because they hold the view that only accountability should be included as an objective of financial reporting. OR Respondent disagrees with the ED and holds the view that accountability should be the primary objective (decision usefulness is secondary).	that both accountability and decision-usefulness should be included as objectives of financial reporting, OR Respondent disagrees with the ED because they hold the view that only decision-usefulness should be included as an objective of financial reporting.
5.1	Phase One – Exposure draft MfC 3	Qualitative characteristics of, and constraints on, information included in GPFRs of public sector entities. In particular, whether: (a) "Faithful representation" rather than "reliability" should be used in the Conceptual Framework to describe the qualitative characteristic that is satisfied when the depiction of an economic or other phenomenon is complete, neutral, and free from material error; and (b) Materiality should be classified as a constraint on information that is included in GPFRs or as an entity-specific component of relevance; (IPSASB, 2010a)	The respondent holds the following position: 5.1 Reliability should be included as a qualitative charactestic rather than faithful representation. (disagree with ED)	The respondent holds the following position: 5.1 Faithful representation should be included as a qualitative characteristic rather than reliability (agree with the ED)
5.2	Phase One – Exposure draft MfC 3		The respondent holds the following position: 5.2 Predictive value should be excluded from the relevance characteristic (disagree with ED)	The respondent holds the following position: 5.2 Predictive value should be included in the relevance characteristic (agree with the ED)
5.3	Phase One – Exposure draft MfC 3		The respondent holds the following position: 5.3 Prudence should be included as a qualitative characteristic or as a component of faithful representation (disagree with ED)	The respondent holds the following position: 5.3 Prudence should not be included as a qualitative characteristic or as a component of faithful representation. (agree with the ED)
5.4	Phase One – Exposure draft MfC 3		The respondent holds the following position: 5.4 The Qualitative Characteristics should not be classified as fundamental and enhanching in the manner done by the IASB (only if the issue is mentioned)	The respondent holds the following position: 5.4 The Qualitative Characteristics should be classified as fundamental and enhanching in the manner done by the IASB (disagree with ED)
6	Phase Two - Consultation paper MfC 11(a)	a) Should revenues and expenses be determined by identifying which inflows and outflows are "applicable to" the current period (derived from a revenue and expense-led-approach),or by changes in net assets, defined as resources and obligations, "during" the current period (derived from an asset and liability-led-approach)?	Revenue and expense led approach	Asset and liability led approach
7	Phase Two -	Do you agree with the decision to define deferred inflows and	The respondent agrees with	The respondent disagrees

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
	Exposure draft MfC 5(a)	deferred outflows as elements? If not, why not?	the decision to define deferred inflows and deferred outflows as elements.	with the decision to define deferred inflows and deferred outflows as elements.
	Asset recognition (Section 2.3.2)			
8.1	Phase Two – Consultation paper MfC 1(a)	Should the definition of an asset cover all of the following types of benefits—those in the form of: (i) Service potential; (ii) Net cash inflows; and (iii) Unconditional rights to receive resources? (b) What term should be used in the definition of an asset: (i) Economic benefits and service potential; or (ii) Economic benefits? (IPSASB, 2010b)	8.1 The respondent holds the view that service potential should be excluded from the definition of an asset.	8.1 The respondent holds the view that service potential should be included in the definition of an asset.
8.2	Phase Two – Consultation paper MfC 1(a)		8.2 The respondent holds the view that unconditional rights to receive resources should be excluded from the definition of an asset	8.2 The respondent holds the view that unconditional rights to receive resources should be included in the definition of an asset
9	Phase Two – Consultation paper MfC 3	Is it sufficient to state that an asset is a "present" resource, or must there be a past event that occurs? (IPSASB, 2010b)	The respondent holds the view that there must be a past event in order for there to be an asset.	The respondent holds the view that it is sufficient for an asset to be a present resource irrespective of there being a past event.
10	Phase Two – Consultation paper MfC 4	Recognition and measurement criteria aside, are public sector entity rights and powers, such as those associated with the power to tax and levy fees, inherent assets of a public sector entity, are they assets only when those powers are exercised, or is there an intermediate event that is more appropriate? (IPSASB, 2010b)	The respondent holds the view that rights and powers only constitute an asset if such powers are exercised. (or they never constitute an asset)	The respondent holds the view that rights and powers can constitute an asset before such powers are exercised. E.g. for the right to tax: this can include where the asset is raised when a taxable event occurs but before the actual power is exercised (i.e.. tax is assessed)
11.1	Phase Two – Exposure draft MfC 1	Do you agree with the definition of an asset? If not, how would you modify it? (IPSASB, 2012)	11.1 The respondent disagrees with the view that service potential should be included in the definition of an asset or as a definied sub-set of economic benefits.	11.1 The respondent agrees with the view that service potential should be included in the definition of an asset or as a definied sub-set of economic benefits.
11.2	Phase Two – Exposure draft MfC 1		11.2 The respondent agrees with the view that the need for a past event should be included in the definition of an asset.	11.2 The respondent disagrees with the view that the need for a past event should be included in the definition of an asset.
	Inter-generational equity (Section 2.3.3)			
12	Phase One – Consultation paper PV 5	The scope of financial reporting encompasses the provision of financial and non-financial information about: … prospective financial and other information about the reporting entity's future service delivery activities and	The respondent disagrees with the preliminary view that the scope of financial reporting includes *prospective financial and other information about the reporting entity's future service delivery*	The respondent agrees with the preliminary view that the scope of financial reporting includes *prospective financial and other information about the reporting entity's future service delivery*

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
		objectives, and the resources necessary to support those activities. … (IPSASB, 2009)	*activities and objectives, and the resources necessary to support these activities.*	*activities and objectives, and the resources necessary to support these activities.*
13	Phase One - Exposure draft MfC 1	The IPSASB would particularly value comments on whether you agree with the: Role, authority and scope of the Conceptual Framework; (IPSASB, 2010a)	The respondent disagrees with the ED with respect to the inclusion of future information (including financial and non-financial information, and anticipated future service delivery activities and resource needs) in GPFRs.	The respondent agrees with the ED with respect to the inclusion of future information (including financial and non-financial information, and anticipated future service delivery activities and resource needs) in GPFRs.
14	Phase Two – Consultation paper MfC 6(a)	Should the definition of a liability cover all of the following types of obligations? (i) Obligations to transfer benefits, defined as cash and other assets, and the provision of goods and services in the future. (ii) Unconditional obligations, including unconditional obligations to stand ready to insure against loss (risk protection). (iii) Performance obligations. (iv) Obligations to provide access to or forego future resources. (IPSASB, 2010b)	The respondent holds the view that the definition should exclude performance obligations.	The respondent holds the view that the definition should include performance obligations.
15	Phase Two – Consultation paper MfC 6(b)	Is the requirement for a settlement date an essential characteristic of a liability? (IPSASB, 2010b)	The respondent holds the view that a settlement date is an essential characteristic of a liability.	The respondent holds the view that a settlement date is not an essential characteristic of a liability.
16	Phase Two – Consultation paper MfC 7(b)	Do you agree that the absence of a realistic alternative to avoid the obligation is an essential characteristic of a liability? (IPSASB, 2010b)	The respondent holds the view that the absence of a realistic alternative to avoid the obligation is an essential characteristic of a liability.	The respondent holds the view that the absence of a realistic alternative to avoid the obligation is not an essential characteristic of a liability.
17	Phase Two – Consultation paper MfC 7(c)	Which of the three approaches identified in paragraph 3.28 do you support in determining whether an entity has or has not a realistic alternative to avoid the obligation? *(a) Enforceable contractual, constructive, and equitable obligations.* *(b) Enforceable contractual, constructive, and equitable obligations and other constructive and equitable obligations associated with exchange transactions.* *(c) Enforceable contractual, constructive, and equitable obligations and all other constructive*	The respondent supports the view described in option A, or a narrower approach.	The respondent supports the view described in option C, or a wider approach.

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
		and equitable obligations from which the public sector entity cannot realistically withdraw. (IPSASB, 2010b)		
18	Phase Two – Consultation paper MfC 8	Is it sufficient to state that a liability is a "present" obligation, or must there be a past event that occurs? (IPSASB, 2010b)	The respondent holds the view that there must be a past event for there to be a liability.	The respondent holds the view that there only should be a present obligation for there to be a liability, irrespective of a past event.
19	Phase Two – Consultation paper MfC 9(a)	Recognition and measurement criteria aside, are public sector entity obligations such as those associated with its duties and responsibilities as a government, perpetual obligations, obligations only when they are enforceable claims, or is there an appropriate intermediate event that is more appropriate? (IPSASB, 2010b)	The respondent holds the view that obligations associated with the duties and responsibilities of a government are only obligations when there is an enforceable claim.	The respondent holds the view that obligations associated with the duties and responsibilities of a government are perpetual obligations or liabilities irrespective of the existence of an enforceable claim.
20	Phase Two – Consultation paper MfC 9(b)	Is the enforceability of an obligation an essential characteristic of a liability? (IPSASB, 2010b)	The respondent holds the view that the enforceability of an obligation is an essential characteristic of a liability.	The respondent holds the view that the enforceability of an obligation is not an essential characteristic of a liability.
21	Phase Two – Consultation paper MfC 9(c)	Should the definition of a liability include an assumption about the role that sovereign power plays, such as by reference to the legal position at the reporting date? (IPSASB, 2010b)	The respondent holds the view that the definition of a liability should include an assumption about the role that sovereign power plays on the basis that the legislative position at the reporting date is not relevant. (i.e. don't recognise liabilities if government could use its sovereign power to avoid)	The respondent holds the view that reference should be made to the legislative position at the reporting date.
22.1	Phase Two – Exposure draft MfC 2	a. Do you agree with the definition of a liability? If not, how would you modify it? b. Do you agree with the description of non-legal binding obligations? If not, how would you modify it? (IPSASB, 2012)	22.1 The respondent agrees with the inclusion of the need for a past event in the definition of a liability	22.1 The respondent disagrees with the inclusion of the need for a past event in the definition of a liability
22.2	Phase Two – Exposure draft MfC 2		22.2 The respondent agrees with the view that the definition of a liability (or the definition of an obligation) should include the words 'where there is little or no alternative to avoid'.	22.2 The respondent disagrees with the view that the definition of a liability (or the definition of an obligation) should include the words 'where there is little or no alternative to avoid'.
22.3	Phase Two – Exposure draft MfC 2		22.3 The respondent disagrees with the definition of a liability including an outflow of service potential.	22.3 The respondent agrees with the definition of a liability including an outflow of service potential.
22.4	Phase Two – Exposure draft MfC		22.4 The respondent disagrees with paragraph 3.10: a liability can	22.4 The respondent agrees with paragraph 3.10: a liability can arise

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
	2		arise from non-legal binding obligations.	from non-legal binding obligations.
22.5	Phase Two – Exposure draft MfC 2		22.5 The respondent disagrees with paragraph 3.4: a binding obligation can arise from non-exchange transactions.	22.5 The respondent agrees with paragraph 3.4: a binding obligation can arise from non-exchange transactions.
22.6	Phase Two – Exposure draft MfC 2		22.6 The respondent disagrees with paragraph 3.9 which states that sovereign power is not a rationale for non-recognition of obligations.	22.6 The respondent agrees with paragraph 3.9 which states that sovereign power is not a rationale for non-recognition of obligations.
	Whole of government reporting (Section 2.3.4)			
23	Phase One – Consultation paper PV 8	A group reporting entity will comprise the government (or other public sector entity) and other entities when the government (or other public sector entity): has the power to govern the strategic financing and operating policies of the other entities (a "power criterion"); and can benefit from the activities of the other entities, or is exposed to a financial burden that can arise as a result of the operations or actions of those entities; and can use its power to increase, maintain, or protect the amount of those benefits, or maintain, reduce, or otherwise influence the financial burden that may arise as a result of the operations or actions of those entities (a "benefit or financial burden/loss" criterion). (IPSASB, 2009)	The respondent disagrees with the concept of whole-of-government reporting in the public sector (even if they support group reporting at lower levels than whole-of-government)	The respondent agrees with the concept of whole-of-government reporting in the public sector. Support of the wording of the CP is considered support for whole-of-government reporting. Simply saying that the issue should be dealt with at standards level will result in "None", unless there is an indication elsewhere in the letter of supporting whole-of-government reporting.
24	Phase One – Exposure draft MfC 4	The basis on which a public sector reporting entity is identified and the circumstances in which an entity should be included in a group reporting entity. (IPSASB, 2010a)	The respondent disagrees with the concept of whole of government reporting in the public sector.	The respondent agrees with the concept of whole-of-government reporting in the public sector.
	Performance-focused reporting (Section 2.3.5)			
25	Phase One – Consultation paper PV 5	The scope of financial reporting encompasses the provision of financial and non-financial information about: … the reporting entity's achievement of its service delivery objectives; and … (IPSASB, 2009)	The respondent disagrees with the preliminary view that the scope includes the reporting entity's achievement of its service delivery objectives as a part of financial reporting (including if they view it as secondary or on a lower level to the financial statements)	The respondent agrees with the preliminary view that the scope includes the reporting entity's achievement of its service delivery objectives as a part of financial reporting.

SPN	Consultation Paper/ Exposure Draft Reference	Preliminary view (PV) / Specific matter for comment (MfC)	Progressive public administration (PPA)	New public management (NPM)
26	Phase One – Consultation paper PV 5	The scope of financial reporting encompasses the provision of financial and non-financial information about: … the reporting entity's compliance with relevant legislation or regulation and legally adopted or approved budgets used to justify the raising of monies from taxpayers and ratepayers; ... (IPSASB, 2009)	The respondent agrees with the preliminary view that the scope of financial reporting includes the reporting entity's compliance with relevant legislation or regulation and legally adopted or approved budgets used to justify the raising of monies from taxpayers and ratepayers. Support for either compliance with legislation/regulation OR budgets is considered a PPA position.	The respondent disagrees with the preliminary view that the scope of financial reporting includes the reporting entity's compliance with relevant legislation or regulation and legally adopted or approved budgets used to justify the raising of monies from taxpayers and ratepayers. Disagreement must be with both compliance with legislation/regulation AND budgets to be considered a NPM position.
27	Phase One - Exposure draft MfC 1	The IPSASB would particularly value comments on whether you agree with the: Role, authority and scope of the Conceptual Framework; (IPSASB, 2010a)	The respondent disagrees with the inclusion of reporting on the achievement of service delivery objectives in GPFRs (including if they view it as secondary or on a lower level to the financial statements).	The respondent agrees with the inclusion of reporting on the achievement of service delivery objectives in GPFRs.
28	Phase One - Exposure draft MfC 1	The IPSASB would particularly value comments on whether you agree with the: Role, authority and scope of the Conceptual Framework; (IPSASB, 2010a)	The respondent agrees with the inclusion of reporting on the compliance with the Budget in GPFRs.	The respondent disagrees with the inclusion of reporting on the compliance with the Budget in GPFRs.

General rules applied to the coding of the comment letters

- If a respondent states that they agree overall, they agree even where they aren't explicit on an issue.
- If a respondent only comments in certain areas and doesn't state that they agree overall, code responses as 'None' where they don't make an explicit comment.
- If a respondent comments or states that they generally agree with a PV/MfC subject to certain comments, but they don't mention the specific issue in those comments, they are seen as supporting the proposal (e.g. if they generally agree with the qualitative characteristics but prudence is not mentioned, it is assumed for coding purposes that they agree with it not being there).
- If a respondent gives detailed comments on a variety of paragraphs over and above the PVs/MfCs, it is assumed that anything they don't mention they agree with (unless they state otherwise).

Appendix B – Categorisation of comment letters

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
Phase 1 Consultation Paper				
1	Accounting Standards Board (United Kingdom)	Accounting professionals	Local standard setter	Based on name
2	Joint Accounting Bodies	Accounting professionals	Accounting professional organisations	Based on the respondent's letter, the respondent is made up of accounting professional organisations.
3	Australian Department of Finance and Deregulation	None	N/A	The letter did not deal with any issues that were relevant to this research.
4	New South Wales Treasury	Government agencies	Government department	Based on name
5	Public Sector Accounting Board	Accounting professionals	Local standard setter	Confirmed via website (www.frascanada.ca/public-sector-accounting-board/what-we-do/about=psab/index.aspx)
6	Controller and Auditor-General - New Zealand	Accounting professionals	SAI - AG model	Based on name
7	The University of Sheffield	None	N/A	Excluded because respondent is representing a university
8	The Treasury of New Zealand	Government agencies	Government department	Based on name
9	Office of the Scottish Charity Regulator	None	Not-for-profit sector	Excluded because the respondent is representing the views of the not-for-profit sector. Such views are beyond the scope of this research.
10	United Nations Systems	International organisation	International organisation	Based on name
11	Swiss Public Sector Financial Reporting Advisory Committee	Government agencies	Represents government	The website, www.srs-cspcp.ch, states the SRS-CSPCP is sponsored by the Federal Department of Finance and the Conference of Cantonal Directors of Finance. Both of these bodies are part of government in Switzerland. In addition, the comment letter specifically notes that it is a "consolidated statement for all three Swiss levels of government."
12	French Ministry for the Budget, Public accounts and Civil service	Government agencies	Government department	Based on name
13	Finnish State Accounting Board	Government agencies	Government department	Based on the letterhead and salutation in the comment letter, they are part of the Finnish Ministry of Finance
14	Institute of Certified Public Accountants in Ireland	Accounting professionals	Accounting professional organisations	Based on name
15	Institute of Chartered Accountants of Scotland	Accounting professionals	Accounting professional organisations	Based on name

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
16	The Institute of Chartered Accountants of Sierra Leone	Accounting professionals	Accounting professional organisations, local standard setter	Based on name
17	Ministry of Finance - Netherlands	Government agencies	Government department	Based on name
18	Australasian Council of Auditors-General	Accounting professionals	SAI - AG model	Based on name
19	Ontario Ministry of Finance - Canada	Government agencies	Government department	Based on name
20	Provincial Comptroller of Manitoba - Canada	Government agencies	Government department	Based on name
21	The Swedish Council for Municipal Accounting	Accounting professionals	Local standard setter	Based on the comment letter which states: "the standard setting body for municipal accounting in Sweden."
22	Accounting Standards Board - South Africa	Accounting professionals	Local standard setter	Based on name
23	Jean-Bernard Mattret	None	Individual	Excluded because respondent is an Individual
24	Italian Universities	None	University	Excluded because respondent is representing universities
25	Financial Reporting Standards Board - New Zealand	Accounting professionals	Local standard setter	Based on name
26	Joseph S. Maresca	None	Individual	Excluded because respondent is an Individual
27	French Regional Court of Audit in Ile-de-France	None	Irrelevant letter	This letter does not deal with any of the specific issues of the consultation paper.
28	Federation of European Accountants (FEE)	Accounting professionals	Accounting professional organisations	Based on name
29	Dutch Local Government Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
30	Martin Dees	None	Individual	Excluded because respondent is an Individual
31	General Directorate of Public Finance - France	None	Irrelevant letter	This letter does not take clear positions and is therefore excluded
32	Ernst & Young	Accounting professionals	Accounting firm	Based on name
33	Bouchat-Goubert-Baumann	None	Individual	Excluded because respondent is an Individual
34	Association of Chartered Certified Accountants	Accounting professionals	Accounting professional organisations	Based on name
35	Michael Parry	None	Individual	Excluded because respondent is an Individual
36	Treasury of the Hong Kong Special Administrative Region	Government agencies	Government department	Based on name

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
37	Federacion Argentina de Consejos Profesionales de Ciencias Economicas	Accounting professionals	Accounting professional organisations	Based on letter 76, their translated name is 'Federation of Professional Councils of Economic Sciences'
38	Statistics Canada	None	Irrelevant letter	The letter is not relevant to this study. The respondent has simply shared a document with the IPSASB, but this document is not included on the IPSASB website (only the covering letter was included)
39	Audit Commission	Accounting professionals	Auditors	Although they were not a SAI, they did include in-house financial auditors. (webarchive.nationalarchives.gov.uk/20150421134146/http://www.audit-commission.gov.uk/about-us/)
40	Comptroller General of British Columbia	Government agencies	Government department	Based on name
41	Office of the Auditor General of Canada	Accounting professionals	SAI - AG model	Based on name
42	Chartered Institute of Public Finance and Accountancy (CIPFA)	Accounting professionals	Accounting professional organisations.	Based on name
43	Financial Reporting Advisory Board	Accounting professionals	Local standard setter	Based on introduction in comment letter
44	Australian Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
45	Ministère des Affaires municipales, des Régions et de l'Occupation du territoire	Government agencies	Government department	Based on translated website (www.mamrot.gouv.qc.ca)
46	Provincial Comptroller of Saskatchewan - Canada	Government agencies	Government department	Based on name
47	Institut der Wirtschaftpruefer - Germany	Accounting professionals	Accounting professional organisations	Based on translated name on website: Institute of Public Auditors, and their membership of IFAC (www.idw.de)
48	Cour des Comptes (France)	Government agencies	SAI - Court of audit model	Translated name on website: Court of Audit (www.ccomptes.fr/)
49	Swedish National Financial Management Authority	Government agencies	Government department	Based on the respondents letter, they identify themselves as a government agency
50	Northwest Territories Finance - Canada	Government agencies	Government department	Based on name
51	Governmental Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
52	Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC) (Australia)	Government agencies	Government department	Based on name and letterhead in letter
53	Comptroller of Finance of Quebec	Government agencies	Government department	Based on name
54	Petri Vehmanen - Finland	None	Individual	Excluded because respondent is an Individual
55	Japanese Institute of Certified Public Accountants	Accounting professionals	Accounting professional organisations	Based on name
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No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
56	International Consortium of Government Financial Managers	Accounting professionals	Accounting professional organisations	Based on name and the respondents website (http://www.icgfm.org/)
57	New South Wales Treasury (Australia)	Government agencies	Government department	Based on name
58	Swiss Public Sector Financial Reporting Advisory Committee (Switzerland)	Government agencies	Represents government	The website, www.srs-cspcp.ch, states the SRS-CSPCP is sponsored by the Federal Department of Finance and the Conference of Cantonal Directors of Finance. Both of these bodies are part of government in Switzerland. In addition, the comment letter specifically notes that it is a "consolidated statement for all three Swiss levels of government."
59	International Monetary Fund	International organisation	International organisation	Based on name
60	Institut der Wirtschaftpruefer - Germany	Accounting professionals	Accounting professional organisations	Based on translated name on website: Institute of Public Auditors, and their membership of IFAC (www.idw.de)
61	Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC) (Australia)	Government agencies	Government department	Based on name and letterhead in letter 52
62	University of Canterbury (New Zealand)	None	N/A	Excluded because respondent is representing a university
63	Ron Hodges, University of Sheffield (United Kingdom)	None	Individual	Excluded because respondent is an Individual
64	Aoyama Gakuin University, Kazutoshi Ishii (Japan)	None	University	Excluded because respondent is representing a university
65	Institute of Chartered Accountants of Pakistan	Accounting professionals	Accounting professional organisations	Based on name
66	KPMG IFRG Limited	Accounting professionals	Accounting firm	Based on name
67	Ordre des comptables agrees du Quebec (Canada)	None	Members from both	The respondent compiled the opinions of various members including preparers, auditors, taxpayers and other members of the community. The comment letter therefore included responses from both government agencies and accounting professionals and cannot be used for this research
68	Provincial Government of Newfoundland and Labrador (Canada)	Government agencies	Government department	Based on name
69	Institute of Chartered Accountants of Scotland	Accounting professionals	Accounting professional organisations	Based on name
70	Association of Government Accountants	Accounting professionals	Accounting professional organisations	Comment letter explains that the respondent 'is the member organisation for financial professionals in government'
71	Australasian Council of Auditors-General	Accounting professionals	SAI - AG model	Based on name
72	Instituto de Censores Jurados de Cuentas de España (ICJCE)	None	N/A	Respondent participated in the letter from FEE.
73	Ministry of Finance Ontario (Canada)	Government agencies	Government department	Based on name

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
74	Swedish National Financial Management Authority (Sweden)	Government agencies	Government department	Based on the respondents letter, they identify themselves as a government agency
75	Accounting Standards Board (United Kingdom)	Accounting professionals	Local standard setter	Based on name
76	Federacion Argentina de Consejos Profesionales de Ciencias Economicas	Accounting professionals	Accounting professional organisations	Based on their letter, their translated name is 'Federation of Professional Councils of Economic Sciences'
77	National Audit Office (Malta)	Accounting professionals	SAI - AG model	Based on name
78	Australian Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
79	Denise Silva Ferreira Juvenal (Brazil)	None	Individual	Excluded because respondent is an Individual
80	The Japanese Institute of Certified Public Accountants (Japan)	None	File missing on website	File not readable or missing on IPSASB website
81	Association of Chartered Certified Accountants	Accounting professionals	Accounting professional organisations	Based on name
82	Accounting Standards Board (South Africa)	Accounting professionals	Local standard setter	Based on name
83	Auditor General (New Zealand)	Accounting professionals	SAI - AG model	Based on name
84	Auditor-General of South Africa	Accounting professionals	SAI - AG model	Based on name
85	British Columbia Ministry of Finance	Government agencies	Government department	Based on name
86	Chartered Institute of Public Finance and Accountancy (CIPFA)	Accounting professionals	Accounting professional organisations	Based on name
87	Conseil de Normalisation des Comptes Publics	Accounting professionals	Local standard setter	Based on translated name on website: Public Sector Accounting Standards Council (www.economie.gouv.fr/cnocp-en?language=fr)
88	CPA Australia	Accounting professionals	Accounting professional organisations	Based on their website, they are an accounting professional organisation (https://www.cpaaustralia.com.au/about-us)
89	Charity Commission	None	Not-for-profit sector	Excluded because the respondent is representing the views of the not-for-profit sector. Such views are beyond the scope of this research.
90	Cour des Comptes (France)	Government agencies	SAI - Court of Audit model	Translated name on website: Court of Audit (www.ccomptes.fr/)
91	Danish Agency for Governmental Management	Government agencies	Government department	No official website could be found. Based on Wikipedia, the agency was part of the Ministry of Finance in Denmark but was closed in 2011. (https://da.wikipedia.org/wiki/%C3%98konomistyrelsen)
92	Direction Générale des Finances Publiques (DGFiP) (France)	Government agencies	Government department	Translated name on website: Director General of Public Finance (http://www.economie.gouv.fr)

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
93	Federation of European Accountants (FEE)	Accounting professionals	Accounting professional organisations	Based on name
94	Government of Canada (Canada)	Government agencies	Government department	Based on name
95	Government of Nova Scotia (Canada)	Government agencies	Government department	Based on name
96	HM Treasury (United Kingdom)	Government agencies	Government department	Based on name
97	Ministry of Finance Quebec (Canada)	Government agencies	Government department	Based on name
98	New Zealand Institute of Chartered Accountants (New Zealand)	Accounting professionals	Accounting professional organisations	Based on name
99	Public Sector Accounting Board (staff)	Accounting professionals	Local standard setter	Confirmed via website (www.frascanada.ca/public-sector-accounting-board/what-we-do/about=psab/index.aspx)
100	PSAB Board (Canada)	None	N/A	The comment letter raises only one point, and is almost word for word the same as the PSAB staff (regarding accountability). Excluded to avoid double counting.
101	Saskatchewan Ministry of Finance (Canada)	Government agencies	Government department	Based on name
102	The Treasury of New Zealand	Government agencies	Government department	Based on name
103	United Nations Systems	International organisation	United Nations	Based on name
104	University of London (United Kingdom)	None	N/A	Excluded because respondent is representing a university
105	Wales Audit Office (United Kingdom)	Accounting professionals	SAI - AG model	Based on name
106	Zambia Institute of Chartered Accountants (ZICA)	Accounting professionals	Accounting professional organisations	Based on name
107	Prof. Martin Dees (Nyenrode Business University) (Netherlands)	None	Individual	Excluded because respondent is an Individual
108	Dr. Joseph S. Maresca (USA)	None	Individual	Excluded because respondent is an Individual
109	Government of Manitoba (Canada)	Government agencies	Government department	Based on name
110	Government Accountability Office (USA)	Accounting professionals	SAI - AG model	Based on the respondents website, the respondent is a SAI with similar characteristics to the AG model (http://www.gao.gov)
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111	International Consortium of Government Financial Managers	None	N/A	File not readable or missing on IPSASB website
112	New South Wales Treasury (Australia)	Government agencies	Government department	Based on name

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
113	Swiss Public Sector Financial Reporting Advisory Committee (Switzerland)	Government agencies	Represents government	The website, www.srs-cspcp.ch, states the SRS-CSPCP is sponsored by the Federal Department of Finance and the Conference of Cantonal Directors of Finance. Both of these bodies are part of government in Switzerland. In addition, the comment letter specifically notes that it is a "consolidated statement for all three Swiss levels of government."
114	Institut der Wirtschaftpruefer - Germany	Accounting professionals	Accounting professional organisation	Based on translated name on website: Institute of Public Auditors, and their membership of IFAC (www.idw.de)
115	National Audit Office (Malta)	Accounting professionals	SAI - AG model	Based on name
116	Provincial Government of Newfoundland and Labrador (Canada)	Government agencies	Government department	Based on name
117	The Institute of Chartered Accountants of Pakistan (ICAP) (Pakistan)	Accounting professionals	Accounting professional organisation	Based on name
118	The Institute of Chartered Accountants of Scotland (United Kingdom)	Accounting professionals	Accounting professional organisation	Based on name
119	Australasian Council of Auditors-General	None	None	File not readable or missing on IPSASB website
120	Ministry of Finance Ontario (Canada)	Government agencies	Government department	Based on name
121	Swedish National Financial Management Authority (Sweden)	Government agencies	Government department	Based on the respondents letter, they identify themselves as a government agency
122	Accounting Standards Board (United Kingdom)	Accounting professionals	Local standard setter	Based on name
123	Federation of Professional Councils of Economic Sciences (FACPCE) (Argentina)	Accounting professionals	Accounting professional organisation	Based on their letter, their translated name is 'Federation of Professional Councils of Economic Sciences'
124	Australian Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
125	The Japanese Institute of Certified Public Accountants (Japan)	None	File missing on website	File not readable or missing on IPSASB website
126	Accounting Standards Board (South Africa)	Accounting professionals	Local standard setter	Based on name
127	Chartered Institute of Public Finance and Accountancy (CIPFA)	Accounting professionals	Accounting professional organisation	Based on name
128	Conseil de Normalisation des Comptes Publics	Accounting professionals	Local standard setter	Based on translated name on website: Public Sector Accounting Standards Council (www.economie.gouv.fr/cnocp-en?language=fr)
129	Cour des Comptes (France)	Government agencies	SAI - CoA model	Translated name on website: Court of Audit (www.ccomptes.fr/)
130	Danish Agency for Governmental Management	Government agencies	Government department	No official website could be found. Based on Wikipedia, the agency was part of the Ministry of Finance in Denmark but was closed in 2011. (https://da.wikipedia.org/wiki/%C3%98konomistyrelsen)

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
131	Dr. Joseph S. Maresca (USA)	None	Individual	Excluded because respondent is an Individual
132	Ernst & Young GmbH	Accounting professionals	Accounting firm	Based on name
133	Government of Canada (Canada)	Government agencies	Government department	Based on name
134	Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC) (Australia)	Government agencies	Government department	Based on name and letterhead in letter 52
135	Joint Accounting Bodies (Australia)	Accounting professionals	Accounting professional organisation	Based on the respondent's letter, the respondent is made up of accounting professional organisations.
136	New Zealand Institute of Chartered Accountants (New Zealand)	Accounting professionals	Accounting professional organisation	Based on name
137	Office of the Auditor General (New Zealand)	Accounting professionals	SAI - AG model	Based on name
138	Province of British Columbia (Canada)	Government agencies	Government department	Based on name
139	Public Sector Accounting Board	Accounting professionals	Local standard setter	Confirmed via website (www.frascanada.ca/public-sector-accounting-board/what-we-do/about=psab/index.aspx)
140	The International Consortium on Governmental Financial Management	Accounting professionals	Accounting professional organisation	Based on name and the respondents website (http://www.icgfm.org/)
141	United Nations Systems	International organisation	International body	Based on name
142	Wales Audit Office (United Kingdom)	Accounting professionals	SAI - AG model	Based on name
143	Denise Silva Ferreira Juvenal (Brazil)	None	Individual	Excluded because respondent is an Individual
144	Government of Nova Scotia (Canada)	Government agencies	Government department	Based on name
145	Government of Manitoba (Canada)	Government agencies	Government department	Based on name
146	Government Accountability Office (USA)	Accounting professionals	SAI - AG model	Based on the respondents website, the respondent is a SAI with similar characteristics to the AG model (http://www.gao.gov)
Phase 2 Exposure draft				
147	Association of Government Accountants	Accounting professionals	Accounting professional organisation	Comment letter explains that the respondent 'is the member organisation for financial professionals in government'
148	Wellington City Council (New Zealand)	Government agencies	Local government	Based on name
149	School of Accounting and Commercial Law, Victoria University of Wellington (New Zealand)	None	University	Excluded because respondent is representing a university

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
150	The Institute of Chartered Accountants of Nigeria (Nigeria)	Accounting professionals	Accounting professional organisation	Based on name
151	Swiss Public Sector Financial Reporting Advisory Committee (Switzerland)	Government agencies	Represent government	The website, www.srs-cspcp.ch, states the SRS-CSPCP is sponsored by the Federal Department of Finance and the Conference of Cantonal Directors of Finance. Both of these bodies are part of government in Switzerland. In addition, the comment letter specifically notes that it is a "consolidated statement for all three Swiss levels of government."
152	Conseil de Normalisation des Comptes Publics	Government agencies	Government department	Translated name on website: Public Sector Accounting Standards Council (www.economie.gouv.fr/cnocp-en?language=fr)
153	Federation of European Accountants (FEE)	Accounting professionals	Accounting professional organisation	Based on name
154	New Zealand Accounting Standards Board (New Zealand)	Accounting professionals	Local standard setter	Based on name
155	Accounting Standards Board (South Africa)	Accounting professionals	Local standard setter	Based on name
156	Association of Chartered Certified Accountants	Accounting professionals	Local standard setter	Based on name
157	KPMG IFRG Limited	Accounting professionals	Accounting firm	Based on name
158	Governmental Accounting Standards Board	Accounting professionals	Local standard setter	Based on name
159	The Institute of Internal Auditors (United States)	Accounting professionals	Accounting professional organisation	Based on name
160	Australasian Council of Auditors-General	Accounting professionals	SAI: AG model	Based on name
161	Instituut van de Bedrijfsrevisoren/Institut des Réviseurs d'Entreprises (Belgium)	Accounting professionals	Accounting professional organisation	Based on translated name 'Institute of Company Auditors'
162	International Monetary Fund (United States)	International organisation	International organisation	Based on name
163	Swedish National Financial Management Authority (Sweden)	Government agencies	Government department	Based on the respondents letter, they identify themselves as a government agency
164	Chartered Institute of Public Finance and Accountancy (CIPFA)	Accounting professionals	Accounting professional organisation	Based on name
165	Government of Manitoba (Canada)	Government agencies	Government department	Based on name
166	Institut der Wirtschaftpruefer - Germany	Accounting professionals	Accounting professional organisation	Based on translated name on website: Institute of Public Auditors, and their membership of IFAC (www.idw.de)

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
167	Institute of Certified Public Accountants of Kenya (ICPAK) (Kenya)	Accounting professionals	Accounting professional organisation	Based on name
168	Office of the Auditor General of Canada (Canada)	Accounting professionals	SAI: AG model	Based on name
169	The Institute of Chartered Accountants of Jamaica (ICAJ) (Jamaica)	Accounting professionals	Accounting professional organisation	Based on name
170	Zambia Institute of Chartered Accountants (ZICA)	Accounting professionals	Accounting professional organisation	Based on name
171	Abu Dhabi Accountability Authority (ADAA) (United Arab Emirates)	None	Can't be classified	A review of the respondent's website and a Google search did not bring clarity as to whether the authority is a government agency or accounting professionals.
172	Cour des comptes (France)	Government agencies	SAI: CoA model	Translated name on website: Court of Audit (www.ccomptes.fr/)
173	Graeme Hall-Watson (Australia)	None	Individual	Excluded because respondent is an Individual
174	The Japanese Institute of Certified Public Accountants (Japan)	Accounting professionals	Accounting professional organisation	Based on name
175	United Nations Systems	International organisation	International organisation	Based on name
176	Wales Audit Office (United Kingdom)	Accounting professionals	SAI: AG model	Based on name
177	Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC (Australia)	Government agencies	Government department	Based on name and letterhead in letter 52
178	Denise Silva Ferreira Juvenal (Brazil)	None	Individual	Excluded because respondent is an Individual
179	Province of Ontario - Office of the Provincial Controller (Canada)	Government agencies	Government department	Based on name
180	Malaysian Institute of Accountants (Malaysia)	Accounting professionals	Accounting professional organisation	Based on name
181	Direction Générale des Finances Publiques (DGFiP) (France)	Government agencies	Government department	Translated name on website: Director General of Public Finance (http://www.economie.gouv.fr)
182	European Commission	International organisation	International organisation	Based on name
183	Joint Accounting Bodies (Australia)	Accounting professionals	Accounting professional organisation	Based on the respondent's letter, the respondent is made up of accounting professional organisations.
184	Ernst & Young	Accounting professionals	Accounting firm	Based on name
185	Australian Accounting Standards Board	Accounting professionals	Local standard setter	Based on name

No.	Name	Stakeholder group	Nature of respondent	**Reason for categorisation** (see definitions in Section 1.4)
186	Committee on Accounting for Public Benefit Entities for the Financial Reporting Council	Accounting professionals	Local standard setter	Comment letter explains that the respondent 'advises the FRC Board as the UK standard setter.'