



Not-for-Profit Private Sector Financial Reporting Framework

Project summary

The objective of the project is to develop a reporting framework that is simple, proportionate, consistent, transparent and cost effective for all not-for-profit (NFP) private sector entities in Australia.

Features of such a framework could include additional reporting tiers with:

- simplified recognition and measurement requirements that are capable of being audited and enforced; and
- disclosure of service performance and other information integral to financial reporting in the NFP sector, such as fundraising and transactions with related parties to the extent justified by evidence.

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Project priority: High

Issued documents

- Research Report No.5 *Financial Reporting Requirements Applicable to Charities*
- AASB Discussion Paper: *Improving Financial Reporting for Australian Charities*
- Appendices to Charity Discussion Paper
- Research Report No. 7 *Financial Reporting Requirements Applicable to For-Profit Private Sector Companies*
- Research Report No. 11 *Review of Special Purpose Financial Statements: Large and Medium-Sized Australian Charities*
- Research Report No. 14 *Literature Review: Service Performance Reporting for Not-for-Profits*
- Research Report No. 16 *Financial Reporting By Non-Corporate or Small Entities*
- AASB Discussion Paper: *Development of Simplified Accounting Requirements*

Project Status

- Consultations with targeted stakeholders on the Discussion Paper

Other

- Consultation Paper (ITC 39) *Applying the IASB's Revised Conceptual Framework and Solving the Reporting Entity and Special Purpose Financial Statement Problems* (May 2018)
- Approved project plan
- Snapshot document
- Recorded AASB Education Session and slide pack

The staff of the AASB have prepared this summary for information purposes only. The Board decisions described are tentative and do not change current accounting pronouncements unless otherwise indicated. Official positions of the AASB are determined only after extensive due process and deliberations. While this summary is regularly updated, it does not provide a comprehensive review or statement of events and should not be treated as such.

(Tier 3 Not-for-Profit Private Sector Entities)

AASB outreach

- AASB Outreach: Australian Reporting Framework – Charities
- Roundtable sessions (NFP private)
- Initial targeted consultations
- Conceptual Framework (CF) Project Advisory Panel meeting (a joint meeting for both NFP Private Sector Financial Reporting Framework project and NFP CF project)
- AASB Discussion Paper Outreach on the development of simplified accounting requirements for certain not-for-profit entities

Board deliberations

- AASB Action Alert Update and AASB Board papers

AASB communications

- Differential Reporting Project Update (January 2015)
- AASB Submission to ACNC Legislative Review
- AASB Submission to Treasury on Exposure Draft *Australian Charities and Not-for-Profits Commission Regulations 2022*
- AASB Submission on the Queensland Not-for-Profit subordinate legislation review discussion paper

Latest project news

Date	News
9 May 2023	<u>AASB Action Alert (Issue. No. 222)</u>
8-9 March 2023	<u>AASB Action Alert (Issue. No. 221)</u>
4 August 2022	<u>AASB Action Alert (Issue. No. 216)</u>
22-23 June 2022	<u>AASB Action Alert (Issue. No. 215)</u>
20 May 2022	<u>AASB Action Alert (Issue. No. 214)</u>
7 April 2022	<u>AASB Action Alert (Issue. No. 213)</u>
23-24 February 2022	<u>AASB Action Alert (Issue. No. 212)</u>
10-11 November 2021	<u>AASB Action Alert (Issue. No. 211)</u>
8-9 September 2021	<u>AASB Action Alert (Issue. No. 210)</u>
4 August 2021	<u>AASB Action Alert (Issue. No. 209)</u>
21-22 June 2021	<u>AASB Action Alert (Issue. No. 208)</u>
20-21 April 2021	<u>AASB Action Alert (Issue. No. 207)</u>
24-25 February 2021	<u>AASB Action Alert (Issue No. 206)</u>
11-12 November 2020	<u>AASB Action Alert (Issue No: 205)</u>
16-17 September 2020	<u>AASB Action Alert (Issue No: 204)</u>

AASB Action Alert Update, Minutes and Board Papers

Meeting Date	Update
May 2023	The Board considered a preliminary analysis of the feedback received on the Discussion Paper Development of Simplified Accounting Requirements (Tier 3 Not-for-Profit Private Sector Entities) and decided to proceed with the development of an Exposure Draft on: <ol style="list-style-type: none"> (a) a Tier 3 Accounting Standard with simplified accounting requirements for smaller not-for-profit private sector entities; and (b) removing the ability of certain not-for-profit entities to prepare special purpose financial statements under Australian Accounting Standards.

AASB Action Alert Update, Minutes and Board Papers

The Board decided, to the extent consistent with the project objective to develop simplified and proportionate requirements for smaller not-for-profit private sector entities and in line with the principles the Board applies in this regard, to use the following sources as a starting point for drafting the recognition and measurement proposals:

- (a) if consistent with Tier 2 requirements – compatible requirements in the IFRS for SMEs Accounting Standard, complemented by the International Non-Profit Accounting Guidance (INPAG) proposals or, in their absence, the UK Financial Reporting Standard FRS 102 and the UK Charities Statement of Recommended Practice; and
- (b) if different to Tier 2 requirements – compatible requirements in other jurisdictions and frameworks or, in their absence, adapting the IFRS for SMEs Accounting Standard requirements and/or INPAG proposals as considered appropriate.

3.0 Cover memo: Project overview

3.1.0 Summary of feedback on Tier 3 Discussion Paper and next steps

3.1.1 Attachments: Detailed summary of feedback on the Tier 3 Discussion Paper and next steps

3.2 Tier 3 – Approach to drafting recognition and measurement requirements

3.3 Supporting document – Written Submissions

3.4 Supporting document – Survey results received

March 2023

The Board considered an update on the project, including the preliminary feedback collected from outreach activities and the preliminary findings from research on common transactions of medium-sized charities.

8.1 Cover memo: Project overview

8.2 Preliminary summary feedback from outreach to 31 January 2023

8.3 Preliminary findings from research on common transactions of smaller NFP private sector entities (charities)

August 2022

The Board delegated the final approval of the Discussion Paper (DP) on its proposals for Tier 3 reporting requirements for not-for-profit (NFP) private sector entities to a subcommittee. The DP is expected to be issued in early October 2022 with a consultation period of 6 months. The Board also decided not to develop Tier 4 proposals for smaller NFP private sector entities.

The Board discussed a number of sweep and other issues and decided that Tier 3 reporting requirements should:

- (a) allow an entity to apply related Tier 3 requirements to account for transactions and other events that are not specifically addressed and not explicitly scoped out from the Tier 3 Standard,
- (b) allow an entity to consider the principles and requirements for Tier 1 and Tier 2 reporting dealing with similar and related issues when applying judgement in developing accounting policies for transactions and other events that are explicitly scoped out of the Tier 3 requirements and where no guidance is provided in Tier 2 requirements;
- (c) exclude business combinations from the scope of the Standard (in addition to scope exclusions previously decided by the Board);
- (d) include simpler requirements for government bonds and units held in managed investment schemes and unit trusts as basic financial assets;
- (e) not require an entity to recognise embedded derivatives and derivative financial instruments that are not readily identifiable and measurable;

- (f) align with AASB 9 *Financial Instruments* to identify when cost may be an appropriate estimate of the fair value of financial assets, for example when there is a wide range of possible fair value measurements and cost represents the best estimate of fair value within that range;
- (g) require a parent entity that presents consolidated financial statements to prepare equity-accounted financial statements to measure its interest in associates and joint ventures. A parent entity that only presents separate financial statements would not be permitted to apply the equity method of accounting to measure its interests in associates and joint ventures for those financial statements;
- (h) require a parent entity that presents separate financial statements to measure its interests in subsidiaries:
 - (i) at cost;
 - (ii) at fair value through other comprehensive income; or
 - (iii) by applying the equity method of accounting.
- (i) require an investor to measure its interests in associates and joint ventures at cost or at fair value through other comprehensive income in separate financial statements, in addition to preparing equity-accounted financial statements to measure its interest in associates and joint ventures;
- (j) not permit an entity to subsequently revalue non-financial assets acquired for significantly less than fair value if those assets were initially measured at cost; and
- (k) not include guidance on the accounting for employee on-costs.

The Board decided to seek feedback through the DP to consider the extent of use of intangible assets by smaller not-for-profit private sector entities and the types of intangible assets involved.

The Board also decided that Tier 3 requirements would be reviewed no more than once every AASB agenda consultation cycle (5 years) following any revisions from a post-implementation review, if necessary, in accordance with the AASB Due Process Framework for Setting Standards.

[3.1](#) Cover memo: Project overview

[3.2.1](#) Tier 3 – Draft Discussion Paper

[3.2.2](#) Tier 3 – Summary of sweep and other issues

June 2022

The Board decided to include the following proposals in the Discussion Paper (DP) on Tier 3 reporting requirements for not-for-profit (NFP) private sector entities.

Financial Instruments

Tier 3 reporting requirements should specify the financial instruments that would be within its scope, including those that are simpler in nature, and direct an entity to apply AASB 9 *Financial Instruments* for other financial instruments.

For financial instruments within the scope of Tier 3, the requirements should:

- (a) require interest income and expense to be calculated by reference to the contractual interest rate;
- (b) require any initial premium or discount to be amortised over the expected life of the instrument;
- (c) require impairment to be recognised when it is probable that the carrying amount will not be collectible (an 'incurred loss' model);
- (d) apply the fair value definition in AASB 13 *Fair Value Measurement*;
- (e) not permit hedge accounting;

- (f) require derecognition of a financial asset when either the contractual rights to the cash flows from the financial asset expire or are settled or the entity otherwise loses control of the asset; and
- (g) not address exchanges of debt instruments or the modification of the terms of financial liabilities.

The Board decided to seek feedback through the DP to consider the extent of embedded derivatives in arrangements entered into by smaller NFP entities and the need for specific Tier 3 requirements.

Approach to disclosure requirements

Tier 3 disclosure requirements should be developed based on the following principles:

- (a) for transactions with the same or similar recognition and measurement (R&M) requirements to Tier 2 reporting requirements for NFP private sector entities, the disclosure requirements should be based on the corresponding requirements in AASB 1060 General Purpose Financial Statements –Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities; and
- (b) for transactions with different R&M requirements to Tier 2:
 - (i) adopt appropriate disclosure requirements from other jurisdictions with comparable R&M requirements corresponding to Tier 3 requirements; or
 - (ii) develop specific disclosure requirements in the absence of appropriate international precedents.

The DP will include examples of possible disclosure requirements for some transactions in the scope of the Tier 3 reporting requirements to illustrate the application of the above principles.

[12.1.0](#) Cover memo: Project overview

[12.2.1.0](#) Tier 3 – Financial Instruments

[12.2.1.1](#) Supporting document: Tier 3 – Financial Instruments background previously presented in May 2022

[12.2.2](#) Tier 3 – Financial Instruments: Measurement

[12.2.3](#) Tier 3 – Financial Instruments: Hedge accounting and Embedded Derivates

[12.2.4](#) Tier 3 – Financial Instruments: Derecognition

[12.3.1](#) Tier 3 – Disclosure approach for key topics

[12.3.2](#) Tier 3 – Application of the recommended disclosure approach to transactions covered in the Tier 3 Standards

May 2022

The Board decided to include the following proposals in the Discussion Paper (DP) on Tier 3 reporting requirements for not-for-profit (NFP) private sector entities

Income recognition

Tier 3 reporting requirements should require:

- (b) a Tier 3 entity to assess whether a transaction is based on a common understanding, evidenced by the transfer provider in writing or some other form, that the entity is expected to use the inflows of resources in a particular way or act or perform in a particular way that results in outflows of resources, including:
 - (i) transferring goods or services;
 - (ii) performing a specified activity;
 - (iii) incurring eligible expenditure for a specified purpose; and
 - (iv) using the inflows of resources in respect of a specified time period;
- (c) for transactions described in (a), income to be recognised in the manner that most faithfully represents the amount and pattern of consumption by the entity of the resources received, such as:

- (i) when goods or services are transferred;
 - (ii) when activities are performed;
 - (iii) when eligible expenditure is incurred; and
 - (iv) on a systemic allocation basis over the specified period; and
- (d) for other income transactions, income to be recognised at the earlier of receiving cash or obtaining a right to receive cash (a receivable)

Financial instruments

Tier 3 reporting requirements should:

- (a) address the accounting for simpler financial instruments often held by Tier 3 entities. Tier 3 reporting requirements should direct an entity to apply AASB 9 Financial Instruments for more complex financial instruments;
- (b) require transaction costs that are directly attributable to the acquisition or issue of a financial asset or financial liability to be expensed in the period incurred;
- (c) specify simpler subsequent measurement requirements for financial assets and financial liabilities overall. In particular, the Board decided to require financial assets and financial liabilities to be subsequently measured at cost, except for:
 - (i) financial assets that are held to generate both income and capital return for the entity – to be measured at fair value through other comprehensive income; and
 - (ii) derivative financial instruments – to be measured at fair value through profit or loss.

The Board decided to seek stakeholder feedback through the DP as to whether requiring financial assets and financial liabilities to be measured at transaction price would be a useful simplification.

[5.0](#) Cover memo: Project overview

[5.1.1](#) Staff paper: Tier 3 – Revenue/Income – determining distinction for the accounting for inflows of resources

[5.1.2](#) Staff paper: Tier 3 – Revenue/Income – requiring assessment of sufficiently specific criteria

[5.1.3](#) Staff paper: Supporting document: High level scenarios and other supporting materials

[5.2.1](#) Staff paper: Financial instruments - background

[5.2.2](#) Staff paper: Financial instruments – coverage and measurement

April 2022

The Board decided to include the following proposals in the Discussion Paper (DP) on Tier 3 reporting requirements for not-for-profit (NFP) private sector entities.

Impairment of non-financial assets

Tier 3 reporting requirements should require:

- (d) inventories generally to be measured at the lower of cost and net realisable value; and
- (e) inventories held for distribution to be measured at cost, adjusted when applicable for a loss of service potential.

For non-financial assets other than inventory, the Board decided on the following impairment model:

- (a) only assets subsequently measured at cost or deemed cost should be subject to impairment testing;
- (b) a Tier 3 entity should be required to consider whether assets are impaired only when they have been physically damaged or when their service potential might

- have been adversely affected by a change in the entity's strategy or changes in external demand for the entity's services;
- (c) an asset would be impaired if its carrying amount exceeded its recoverable amount. An asset's recoverable amount is the higher of its fair value less costs of disposal and its value in use. However, the proposed impairment model will include a rebuttable presumption that fair value less costs of disposal is expected to be the most appropriate measure of an asset's recoverable amount because non-financial assets are generally not held by NFP entities for the purpose of generating cash flows;
 - (d) assets that do not generate cash flows that are largely independent of those from other assets can be grouped into cash-generating units; and
 - (e) the impairment model will not include specific requirements relating to reversing previously recognised impairment losses.

Initial measurement of assets acquired for significantly less than fair value

Tier 3 reporting requirements for the initial measurement of assets acquired for significantly less than fair value should allow an entity an accounting policy choice, supplemented by appropriate disclosures, for the measurement of:

- (a) inventory – at cost or current replacement cost; and
- (b) other non-financial assets – at cost or at fair value in accordance with AASB 13 Fair Value Measurement.

Volunteer services

A Tier 3 entity should be permitted, but not required, to recognise volunteer services received, or a class of volunteer services, if the fair value of those services can be measured reliably.

- [4.1](#) Cover memo: Project overview
- [4.2.0](#) Staff paper: Tier 3 – Impairment
- [4.2.1](#) Staff paper: Tier 3 – Supporting document: Detailed requirement of impairment in Australian Accounting Standards
- [4.3](#) Staff paper: Tier 3 – Initial measurement of donated/granted non-financial assets

February 2022

The Board decided to include the following proposals in the Discussion Paper (DP) on Tier 3 reporting requirements for not-for-profit (NFP) private sector entities.

Investment property and property, plant and equipment

Tier 3 reporting requirements should require:

- (a) separate classification, recognition and measurement requirements for investment property and property, plant and equipment (PP&E);
- (b) subsequent measurement for:
 - (i) investment property using either the cost model or the fair value model; and
 - (ii) PP&E using either the cost model or revaluation model, with guidance to be developed for depreciation under revaluation model; and
- (c) all borrowing costs to be recognised as an expense when incurred, which would be a simplification of the requirements in AASB 123 Borrowing Costs.

The Board observed that this approach would require Tier 3 entity that elect to revaluation its investment property or PP&E to measure fair value in accordance with AASB 13 *Fair Value Measurement*. However, the Board decided to seek stakeholder feedback through the DP on simplifications that should be considered for the revaluation of investment property and PP&E.

Employee benefits

The Board decided that all short-term and long-term employee benefits should be measured on an undiscounted basis. The Board decided that the measurement of employee benefits relating to long-service leave should still reflect the probability that payment will be required and to develop guidance in the form of a rebuttable presumption for the application of that requirement. The Board directed staff to conduct further research on the possible content and form of such guidance.

Income/revenue – grants, donations and bequests

The Board decided to consider potential options for income accounting simplification for Tier 3 entities for inclusion in the DP and provided initial feedback to staff on the options for the accounting for grants, donations and bequests that should be considered further in developing proposals for the DP.

- [11.1](#) Cover memo: Project overview
- [11.2](#) Staff paper: Tier 3 – Investment property and Property, plant and equipment
- [11.3](#) Staff paper: Tier 3 – Employee benefits
- [11.4](#) Staff paper: Tier 3 – Revenue/Income (preliminary discussion)
- [11.4.1](#) Supporting documents: Detailed requirements of income pronouncements from other standard setters

November 2021

The Board decided to include the following proposals in the Discussion Paper (DP) on Tier 3 reporting requirements for not-for-profit (NFP) private sector entities.

Primary financial statements

Tier 3 reporting requirements should require an entity to present:

- (a) a statement of financial position;
- (b) a statement of profit or loss and other comprehensive income; and
- (c) a statement of cash flows that:
 - (i) covers both cash and cash equivalents;
 - (ii) reports cash flows from operating activities using only the direct method; and
 - (iii) does not require cash flows from investing activities to be presented to cash flows from financing activities.

The Board decided to seek stakeholder feedback through the DP as to whether other possible simplifications to the statement of cash flows should be considered, such as whether all cash flows should be presented net of Goods and Services Tax (GST).

The Board decided not to form a view for the DP as to whether a statement of changes in equity should be required as part of Tier 3 reporting requirements. The Board observed that while not requiring a statement of changes in equity may be a proportionate response in recognition of the lower-level differential reporting tier, the statement can be useful to some stakeholders in assessing the integrity of the financial statements. Therefore, the DP will seek view on whether the statement of changes in equity should be required.

Recognising the broad characteristics of the entities in the scope of Tier 3, the Board decided to propose in the DP to replicate the Tier 2 requirements for the information presented on the face of the primary financial statements supplemented by guidance or education material.

Leases

The Board decided to propose, for the purpose of the DP, that Tier 3 reporting requirements for leases (other than concessionary leases) should require a lessee (lessor) to:

- (a) recognise lease payments as an expense (income), supplemented by disclosure of information about the entity's lease commitments; and

- (b) measure the lease expense (income) on a straight-line basis over the lease term, unless another systemic basis is more representative of the time pattern of the user's benefit.

- [7.1](#) Cover memo: Project update
- [7.2](#) Staff paper: Tier 3 – primary financial statements
- [7.3](#) Staff paper: Tier 3 – leases

September 2021

The Board considered proposals to include in a Discussion Paper (DP) on the Financial Reporting Framework in respect of entities determining their accounting policies under Tier 3 reporting requirements.

The Board decided to propose that entities in scope of Tier 3 should apply the requirements of a higher tier of Australian Accounting Standards in full for transactions not covered by the Tier 3 reporting requirements. Where transactions are also not covered in Tier 1 or Tier 2 requirements, judgement would be required to determine an accounting policy. Entity management would need to consider the applicability of the following sources, in descending order:

- (a) The principles and requirements in Tier 3 reporting requirements dealing with similar and related transactions or event; and
- (b) the definitions, recognition criteria and measurement concepts for assets, liabilities, income and expenses in the Conceptual Framework, to the extent they do not conflict with the Tier 3 reporting requirements.

The Board decided to include in the DP for stakeholder feedback the following options on applying higher-tier requirements for topics or transactions that are covered by Tier 3 requirements:

- (a) allow application of an accounting policy set out in a higher tier for any topic; or
- (b) allow application of a higher-tier accounting policy only for specific topics permitted by the Board, or
- (c) prohibit application of an accounting policy set out in a higher tier.

- [12.1](#) Staff paper: Application of accounting policies for omitted topics and application of higher tier requirements

August 2021

The Board decided to specify that the primary objective in developing Tier 3 reporting requirements is to develop simplified financial reporting requirements that meet the needs of users of financial statements of smaller not-for-profit (NFP) entities. To recognise that comparability considerations do not conflict with this primary objective, the Board agreed to amend one of the principles against which it will form its views on Tier 3 reporting requirements – to be included in a Discussion Paper (DP) – to read as follows:

- where possible, leverage the information management uses to make decisions about the entity's operations. The ability to leverage the information management uses is made within the context of the NFP conceptual framework, user needs and cost/benefit considerations, and the aim for comparability within Tier 3 reporting requirements.

The Board decided to propose, for the purpose of the DP:

- permitting Tier 3 entities to change accounting policies voluntarily if the change results in financial statements providing more reliable and relevant information about the effects of transactions, other events or conditions on the entity's financial position, financial performance or cash flows; and

- requiring a limited retrospective approach for accounting for changes in accounting policies (both voluntary changes, and required changes where no specific transition requirements apply) and for corrections of errors. The limited retrospective approach recognises the cumulative effects on prior periods in the current period's opening retained earnings, without restating the comparative period(s).

The Board supported the revised project timeline, with publication of the DP expected in the second half of 2022

4.1 Cover memo: Primary objective and staff analysis and recommendations on topics to be included in Tier 3 discussion paper

4.2 Staff paper: Primary objective of setting Tier 3

4.3 Staff paper: Change in accounting policies and correction of errors

June 2021

The Board discussed whether the primary objective of Tier 3 reporting requirements should be to simplify accounting requirements or to facilitate comparability between Tier 3 NFP private sector entities, and the interaction of such primary objective with the Board's principles for developing the proposed Tier 3 requirements. The Board did not form a view and directed staff to perform further work in this regard.

The Board decided to propose developing Tier 3 reporting requirements as a single stand-alone pronouncement that will:

- (a) be drafted in simple language using terminology tailored to NFP private sector entities of the size contemplated by the Board for Tier 3 entities (revenue between \$500,000 and \$3 million);
- (b) have minimal cross-referencing to requirements of other Australian Accounting Standards;
- (c) include a simple Basis for Conclusions; and
- (d) include application guidance, implementation guidance and template financial statements.

The Board also decided to address maintenance of the proposed pronouncement after forming its preliminary views on Tier 3 reporting requirements.

The Board observed that an entity of the Tier 3 size contemplated by the Board should be able to prepare Tier 1 or Tier 2 general purpose financial statements, if it elects to do so. The Board also decided to consider at a future meeting whether to permit an entity to apply the reporting requirements of a higher tier in other cases, such as for a class of transactions or where a topic or guidance is not included in the Tier 3 reporting requirements.

The Board decided not to make any amendments to the 'control' principle set out in AASB 10 Consolidated Financial Statements for Tier 3 reporting requirements. The Board noted that a forthcoming post-implementation review of Appendix E of AASB 10 is expected to address the application of this principle for NFP entities. Consequently, the Board decided not to develop any specific guidance or criteria on identifying controlled entities as part of the Tier 3 reporting requirements.

However, on consideration of the potentially significant effort that might be incurred by Tier 3 entities in identifying controlled entities, the Board decided to allow a NFP private sector entity presenting Tier 3 general purpose financial statements the choice of presenting either:

- (a) consolidated financial statements that consolidate all of its controlled entities, as specified by AASB 10; or
- (b) separate financial statements as its only financial statements.

In addition, where an entity presents separate financial statements as its only financial statements, the Board formed a tentative view that disclosure of the entity's 'significant relationships' should be required, to provide users of the financial statements with information on the other entities that could significantly affect the entity's future financial position or performance. The Board intends to further discuss a definition of 'significant relationships'.

The Board will consider the accounting for investments in associates and joint ventures in consolidated financial statements and the accounting for investments in subsidiaries, associates and joint ventures in separate financial statements at a future meeting. The Board confirmed its previous decisions not to specify any reporting thresholds as part of this project (and to clarify the implications of this decision for entities in the discussion paper as far as possible) and that Tier 1 and Tier 2 reporting requirements of the NFP private sector differential reporting framework should comprise the respective Tier 1 and Tier 2 reporting requirements currently set out in Australian Accounting Standards

- 3.1** Cover memo: Staff analysis and recommendation on certain topics to be included in Tier 3 discussion paper
- 3.2** Staff paper: Setting of Tier 3 reporting requirements in the context of Australian Accounting Standards
- 3.3** Tier 3 reporting control and related entities

April 2021

The Board decided that a discussion paper on a possible differential financial reporting framework for not-for-profit (NFP private sector entities will propose:

- The withdrawal of SAC 1 *Definition of the Reporting Entity for NFP private sector entities*, and the amendment of AASB 1054 *Application of Tiers of Australian Accounting Standards*, to remove the option for such entities to prepare special purpose financial statements; and
- That subject to due processes, these steps should take effect concurrently with:
 - i. Stage 1 of the Board's updated Revised Conceptual Framework for NFP Framework for NFP entities – to avoid simultaneous application of two different concepts of a 'reporting entity' by the same entities; and
 - ii. The Board's differential reporting requirements for NFP private sector entities – to make Tier 3 reporting requirements available immediately, where applicable, for those entities preparing general purpose financial statements for the first time.
- In the discussion paper, the Board will also consult on the cross-cutting issues that could result in NFP modifications of its Revised Conceptual Framework, such as:
 - a) which parties should be identified as the primary users of general purpose financial reports of NFP private sector entities; and
 - b) whether the objective of general purpose financial reporting by NFP sector entities should give greater emphasis to stewardship (or accountability).

The Board decided to develop its proposals on Tier 3 accounting requirements having regard to 'user needs' and 'cost/benefit' as overarching principles, and having regard to balances and transactions commonly undertaken by NFP private sector entities with revenues between \$500,000 and \$3 million. This size indication provides the Board with an indicative boundary for identifying common transactions and forming views on requirements applying to Tier 3 financial statements, but is not intended to identify or limit the entities that might prepare Tier 3 general purpose financial statements in the future.

The Board decided on the following principles, against which it will form its views on Tier 3 accounting requirements, for inclusion in a discussion paper:

- a) the development of Tier 3 reporting requirements is subject to the AASB *Not for-Profit Entity Standard-Setting Framework*;
- b) Tier 3 financial statements are general purpose financial statements. As such, Tier 3 financial statements provide useful information to users of the financial statements;
- c) consistency with the accounting principles specified by Tier 2: Australian Accounting Standards – Simplified Disclosures is desirable, but might not always be warranted, since Tier 3 requirements are being developed as a proportionate response to the costs incurred by certain entities whilst meeting the needs of users of the financial statements for the cohort of entities. For example, opportunities for deviation from Tier 2 accounting principles that could give a similar outcome to users while reflecting an appropriate cost/benefit balance could include disclosure requirements instead of a Tier 2 measurement requirement or an approach of specifying minimum ‘prescriptive’ disclosures;
- d) where possible within the context of its conceptual framework and user needs and cost/benefit considerations, in developing accounting requirements the aim is to maximise leveraging information that management uses to make decisions about the entity’s operations; and
- e) accounting requirements do not impose disproportionate costs to preparers, when compared to benefits of the information.

In forming its views on Tier 3 reporting requirements, the Board decided it would consider, and be informed by, reporting requirements of other jurisdictions applying to similar-sized NFP private sector entities, including New Zealand.

The Board intends to evaluate its future decisions on Tier 3 reporting requirements against its conceptual framework and the similarity of the proposals to existing AASB reporting requirements and New Zealand’s Tier 3 reporting requirements.

[3.1](#) SAC 1 for NFP entities and principles for Tier 3 reporting requirements

[3.2](#) Scope of the NFP FRF discussion paper

[3.3](#) Principles for Tier 3 reporting requirements

February 2021

The Board made the following tentative decisions for future consultation on a possible differential financial reporting framework for not-for-profit (NFP) private sector entities:

- the existing two tiers of reporting requirements (Tier 1 and Tier 2) would continue to be available for NFP private sector entities preparing general purpose financial statements;
- develop a further reporting tier (‘Tier 3’) in response to stakeholder concerns that Tier 2 reporting requirements are not proportionate for certain NFP private sector entities, including those which might no longer be able to prepare special purpose financial statements should the Board decide to remove the ‘reporting entity’ definition currently applicable to NFP entities; and
- not to specify application thresholds for the tiers, but directed staff to engage with regulators on how their requirements for entities to prepare financial statements in accordance with Australian Accounting Standards or otherwise would interact with future financial reporting requirements to ensure clarity in the future consultation document.

AASB Action Alert Update, Minutes and Board Papers

The Board also tentatively decided not to include any service performance reporting proposals in this consultation document, subject to clear communication of how it would address this topic and feedback from relevant regulators on the interaction of this decision with their priorities. The Board reiterated that it considers reporting of service performance information useful to users of the financial statements of NFP private sector entities but acknowledged that complexities in developing proposals in this regard might disproportionately delay progress on the differential reporting framework.

The Board will consider proposals for Tier 3 reporting requirements for the consultation document at future meetings.

- [5.1](#) Cover memo-Scope of the public consultation document
- [5.2](#) Possible differential reporting Tiers for not-for-profit private sector entities
- [5.3](#) Applicability of the different tiers to not-for-profit private sector entities
- [5.4](#) Scope of NFP FRF project – Service Performance Reporting

November 2020

The Board noted further feedback from the initial targeted consultations and decided to develop a Consultation Paper. The Board emphasised the importance and urgency of the financial reporting issues and will review the project timeline after considering the scope of a working draft of the Consultation Paper at the February 2021 Board meeting, including whether service performance information reporting should be included in the Consultation Paper.

- [3.1](#) Summary of initial targeted consultation and next steps

September 2020

The Board noted the feedback from the initial targeted consultations with stakeholders, including issues raised on the scope and nature of the initial design of the framework based on the New Zealand Tier 3 and Tier 4 Standards for not-for-profit private sector entities: Public Benefit Entity Simple Format Reporting – Accrual (Not-For-Profit) and Public Benefit Entity Simple Format Reporting – Cash (Not-For-Profit). The Board asked staff to continue with the targeted consultations with stakeholders to further inform the Board's deliberations on the next steps at a future meeting.

- [5.1](#) Summary of initial targeted consultation and key matters identified

November 2019

Project plan

The Board approved an updated project plan.

- [5.1](#) Project Plan – NFP Private Sector Financial Reporting Framework

Disclosure of Compliance with R&M in SPFS of Not-for-Profit Private Sector Entities

The Board finalised requirements for not-for-profit private sector entities preparing and lodging special purpose financial statements (SPFS) with ASIC and ACNC – and other entities complying with AASB 1054 – to disclose information regarding compliance with the recognition and measurement (R&M) requirements in Australian Accounting Standards by making [AASB 2019-4 Amendments to Australian Accounting Standards – Disclosure in Special Purpose Financial Statements of Not-for-Profit Private Sector Entities on Compliance with Recognition and Measurement Requirements](#).

AASB 2019-4 applies to annual reporting periods ending on or after **30 June 2020**.

September 2019 Disclosure of Compliance with R&M in SPFS - AASB 1054 (ED 293)

The Board decided:

(a) NFP entities required by legislation or otherwise to comply with AASB 1054 *Australian Additional Disclosures*, such as medium and large charities with revenue greater than \$250,000, registered with the Australian Charities and Not-for-profits Commission (ACNC) and companies limited by guarantee lodging financial reports with ASIC will be required to make the disclosures about compliance with recognition and measurement (R&M) requirements of Australian Accounting Standards (AAS) in their special purpose financial statements (SPFS) for annual reporting periods ending on or after 30 June 2020.

The Board noted the ACNC expressed support for increased transparency of the financial reporting in the sector. Also, the work is on-going to consider further changes to the financial reporting framework for NFP entities.

- (b) for each material disclosed accounting policy disclose whether it does not comply with AAS R&M requirements or the compliance has not been assessed.
- (c) on the basis of the assessment in (b), disclosure is made as to whether overall the AAS R&M requirements are complied with (no instances of non-compliance or non-assessment), not complied with (1 or more instances of non-compliance) or not assessed (1 or more instances of non-assessment). Where there is known non-compliance an indication of the non-compliance should be disclosed.
- (d) disclosure of compliance with the R&M requirements in AAS excludes consolidation and the equity method of accounting as these are the subject of separate disclosures;
- (e) relief from determining whether or not its interests in other entities give rise to interests in subsidiaries, associates or joint ventures is only available where there is no legislative requirement to make this determination; and
- (f) the proposed implementation guidance and illustrative examples in ED 293 will be updated to reflect the above decisions.

The Board noted its amended proposals do not require more information than the NFP entities already provide, as they may indicate they have not made an assessment of compliance with AAS R&M. The Board acknowledged that there is less clarity in SPFS R&M requirements for charities and the new disclosures provide appropriate information for users without undue cost to preparers. Although the scope of the proposals has been limited to NFP entities, the Board decided that a fatal-flaw review version for public comment was not required as the proposals are less onerous.

18.1 Staff Paper: AASB 1054 – Disclosure of Compliance with R&M in SPFS – Revised

February 2019

The Board noted that State and Territory consumer protection agencies are supportive of working with the Board and other not-for-profit (NFP) regulators on the issue of simplifying financial reporting in the NFP private sector.

November 2018

The Board welcomed ACNC Commissioner Dr Gary Johns to the meeting. The Board and Dr Johns agreed on the importance of consistent and appropriate external reporting for NFP

private sector entities (including non-ACNC regulated entities). The Board will begin consulting with a wide range of stakeholders on the reporting framework options for the NFP private sector.

August 2018

The impact of the AASB's revised Conceptual Framework proposals on not-for-profit private sector entities

The Board decided to issue a frequently asked question (FAQ) to help charities, companies limited by guarantee, incorporated associations, cooperatives and other not-for-profit private sector (NFP) entities understand the impact of the proposals in AASB's Consultation Paper ITC 39.

The FAQ will outline the Board's expectation that it will, in consultation with the Australian Charities and Not-for-profits Commission's (ACNC) and state and territory regulators, explore three tiers of reporting for NFP entities; each with consistent, comparable and transparent reporting requirements – dependent on recommendations from the recent ACNC legislative review. It will explain how special purpose financial statements (SPFS) are expected to be replaced for NFP entities with reporting requirements that are proportionate, fair and balance user needs with costs to preparers as outlined below:

- (a) Bottom tier – most likely be cash accounting, with a statement of resources and commitments (for ACNC NFP's voluntary basis only, supporting completion of the Annual Information Statement);
- (b) Middle tier either Tier 2 General Purpose Financial Statements (GPFS) [full recognition and measurement with simplified disclosure] or a modified accrual framework [simplified recognition, measurement and disclosure]; and
- (c) Top tier – either Tier 1 [full recognition, measurement and disclosure] or Tier 2 GPFS framework (depending on where the middle tier lands).

The Board also decided to explore the possibility of putting NFP thresholds and requirements into the existing AASB 1053 Application of Tiers of Australian Accounting Standards. This would ensure that all NFPs required by legislation or otherwise to prepare financial statements in accordance with Australian Accounting Standards would prepare comparable, consistent and transparent financial statements using the Bottom, Middle or Top tiering requirements.

The FAQ will also explain that the Board will perform extensive consultation on a broader range of proposals for NFPs compared to what was contained in ITC 39. In addition to looking at the three tiers of reporting, the Board will be looking at service performance reporting (also known as impact reporting), remuneration reporting, fundraising and related party disclosures. Transitional relief for NFP entities would also be explored at that time.

The Board noted that NFP entities could still assist with the proposals in ITC 39 by providing feedback on whether they prefer the existing Tier 2 GPFS framework – Reduced Disclosure Requirements or the newly proposed Tier 2 GPFS framework – Specified Disclosure Requirements for the Top or Middle tiers. This will help to inform the AASB which option they should pursue in further consultation.

AASB Action Alert Update, Minutes and Board Papers

December 2017 The Board will provide the summary of the feedback from the outreach sessions held in November regarding the financial reporting framework for charities to the ACNC legislative review.

8.0 Cover Memo – Financial Reporting Framework

8.1 Staff Collation of Feedback from Outreach Sessions – Improving the financial reporting framework for Australian charities

The Board approved the project plan for considering the financial reporting framework for public sector entities, with minor amendments. The Board also supported a field work proposal from an academic research group as the research may help inform decisions about the reporting framework.

8.2 Project plan for the Financial Reporting Framework for public sector entities

8.3 Staff Paper – Research Project Facilitation

October 2017 The Board noted the Consultation Paper is to assist charities to provide input to the legislative review of the ACNC, commencing 3 December 2017. Accordingly regulators including the ACNC and relevant State regulators will be engaged to participate in the consultation process. The Board is particularly interested in consulting with users of charity financial statements.

7.0 Cover Memo Australian Financial Reporting Framework

7.1 AASB Research Report No X Financial Reporting Requirements for Charities – an Intranational and International Comparison [WORKING DRAFT]

August 2017 **Australian Financial Reporting Framework – Draft Research Report on Charities**

Staff provided a progress report on the AASB Research Report on financial reporting requirements for charities. The Board decided the research to date was sufficient as a basis for identifying (a) issues with the current reporting framework in Australia for charities and (b) the findings and implications from the research relevant to improving the reporting framework. Accordingly, the Board decided the Research Report (together with an executive summary) should be published as soon as possible. The Research Report will provide a context for the subsequent Consultation Paper on possible options for improving the financial reporting framework applicable to charities registered with the Australian Charities and Not-for-profits Commission (ACNC), an early draft of which was also discussed by the Board (see below).

Australian Financial Reporting Framework – Draft Consultation Paper on Charities

In relation to the Consultation Paper referred to above, the Board decided:

- (a) the Paper should clearly explain the basis for considering changing the current financial reporting framework for charities and the respective roles of the AASB and regulators in developing a revised framework;
- (b) to issue the Paper to enable adequate input into the legislative review of the ACNC, which is due to commence in December; and
- (c) key stakeholders should be engaged early in the process, with outreach planned jointly with the ACNC to discuss possible options for improving the framework.

AASB Action Alert Update, Minutes and Board Papers

The Board and the ACNC Commissioner, Susan Pascoe, agreed the ACNC should have significant input into the Paper.

4.0 Cover Memo Australian Financial Reporting Framework

4.1 WORKING DRAFT AASB Research Report No. X Financial Reporting Requirements for Charities – an Intranational and International Comparison

June 2017

The Board noted progress on the staff's NFP benchmarking report "*Reporting Requirements for Not-for-Profit Entities – An International Comparison*" as well as a revised plan for the project. A consultative document will also be developed to facilitate discussions on reporting thresholds and requirements for not-for-profit entities.

6.0 Staff Paper: Not-for-profit private sector benchmarking report

May 2017

The Board considered an updated project plan. In particular, staff will work in conjunction with other key regulatory bodies and stakeholders to determine user needs for information and to consider the costs and benefits of the financial reporting requirements for all Australian entities. Extensive research work, including comparing the existing reporting requirements with other jurisdictions, and consultation activities are underway to better understand and assess the criteria for determining (a) which entities are required to prepare general purpose financial reports and (b) the reporting requirements applicable to entities.

7.1 Staff Paper: Australian Financial Reporting Framework

June 2016

Staff outlined the continuing development of benchmarking reports regarding financial reporting requirements for for-profit and not-for-profit entities in the private and public sectors. These reports will provide a basis for further consultation with regulators and other stakeholders.

7.0 Cover memo – Australian Financial Reporting Framework

7.2 Updated project plan

April 2016

Staff outlined the continuing work to develop benchmarking reports regarding financial reporting requirements for for-profit and not-for-profit entities in the private and public sectors. These reports will support further consultation with regulators and other stakeholders. No decisions were made.

February 2016

The Board supported the general view expressed at roundtables held in January that there is scope for improving the application of financial reporting requirements for not-for-profit entities in the private and public sectors. The roundtables discussed many aspects, including reporting thresholds and the possibility of adding a third tier of reporting requirements. Summaries of the roundtable discussions will be published on the AASB website. The Board noted the importance of ongoing consultation with a broad range of stakeholders as the project progresses. No decisions were made.

9.0 Memorandum – Financial Reporting Framework

9.3 Extracts from the Final Report of the Royal Commission into Trade Union Governance and Corruption relating to financial reporting by trade unions

December 2015

The Board received an update on the project addressing the Australian financial reporting framework in terms of which entities should prepare and lodge general purpose financial statements and the content of such financial statements. No decisions were made.

7.1 Staff Paper – Financial Reporting Framework

May 2015

The Board supported the project to reconsider the Australian financial reporting framework in terms of which entities should prepare financial statements and the content of those financial statements.

The Board noted the project plan, which raises the possibility of a third tier of reporting requirements for the not-for-profit sector.

11.1 Memorandum – Financial Reporting Framework

11.2 Project Plan