

RESEARCH ARTICLE

Designing international public sector accounting standards: An analysis of constituents' participation through comment letters

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Abstract

Harmonization of public sector accounting is attracting increasing attention from scholars and practitioners. A focal component of this phenomenon is the setting of accounting standards, whose legitimacy is paramount to their application. As participation by constituents is considered fundamental for ensuring this legitimacy, in this study, we focus on participation through comment letters in the due process. In particular, we explore the type of respondents, their geographical area, their agreement/disagreement with the documents prepared by the International Public Sector Accounting Standards Board (IPSASB) and the issues of importance to them, through an analysis of the comment letters submitted for six projects launched over the period 2017–2020 by the IPSASB. Furthermore, we analyze some factors that may affect countries' participation in the due process. The analysis enriches our understanding of the IPSASB's due process and provides relevant insights for the growing research into accounting standard-setting.

KEYWORDS

harmonization, input legitimacy theory, IPSASB due process, public sector accounting standards, standard-setting

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1 | INTRODUCTION

The process of harmonizing public sector accounting standards, at both national and international levels, has increased the pace of standard implementation in recent years (IFAC/CIPFA, 2021), particularly in Europe (Brusca et al., 2015, 2021; Manes-Rossi et al., 2016, 2021). However, harmonization involves a lengthy process whereby standard setters play a leading role in formulating the standards to be adopted and in open consultation processes, to obtain legitimacy and facilitate the final adoption of the standards produced (Polzer et al., 2020).

Participation by constituents is considered fundamental for ensuring the legitimacy of the standard-setting process and of the standard-setting bodies themselves (Holder et al., 2013; Larson, 2007). Constituents may influence accounting standard-setting in both formal and informal ways (Jorissen et al., 2012), and thereby contribute to the preparation of the final version of the standards.

The present research focuses on the formal participation of different categories of respondents in the accounting standard-setting process in the public sector. In particular, it explores the involvement of various constituents in the International Public Sector Accounting Standards Board's (IPSASB) due process through an analysis of comment letters in order to discuss whether the input received allows the board to gain legitimacy (Jorissen et al., 2013; Richardson & Eberlein, 2011).

A large body of literature highlights that having a proper due process—characterized by widespread participation of the constituents and with consideration for the plurality of their viewpoints—is fundamental for the legitimacy of international accounting standard setters and to ensure compliance with the standards issued (Bamber & McMeeking, 2016; Chatham et al., 2010; Johnson & Solomons, 1984; Larson, 2007; Richardson, 2008; Richardson & Eberlein, 2011; Wallace, 1990). Comment letter submission is an integral component and the main formal aspect of constituent participation during the standard-setting due process (Larson, 2007). As such, comment letters especially have been studied by scholars interested in accounting standard-setting at both the national and international levels. With specific reference to the international level, most studies have focused on the private sector, while only a few have investigated the participation of constituents during the standard-setting process for the public sector. Existing studies have usually focused on a single document and investigated stakeholder types, their geographical origins, and the tone of the responses as well as the arguments provided by the respondents (Bisogno et al., 2015; De Wolf et al., 2021). A multi-year, multi-issue approach was adopted only by Kidwell and Lowensohn (2019), who explored the institutional legitimacy of international public sector accounting standard setters for the period of 2010–2017 by focusing on the due process.

Following the recent call by Sanada (2020) for more empirical research to assess whether the legitimacy of accounting standard setters is assured by the participation of constituents, the present study aims to enrich the literature on the legitimacy of international public sector accounting standard setters by analyzing the comment letters regarding six documents issued by the IPSASB over the period 2017–2020 (namely, consultation papers on heritage assets, measurement, and revenues and non-exchange expenditure as well as exposure drafts 70, 71, and 72). Consistent with this aim, the present study refers to the processual view of legitimacy proposed by Richardson and Eberlein (2011), focusing on input legitimacy and adopting the cost–benefit model developed by Sutton (1984) to explore constituents' formal participation in the process of international accounting standard-setting for the public sector.

The remaining part of the study is organized as follows. The following section provides a literature review on the harmonization process in public sector accounting. Section 3 presents a theoretical framework, discussing legitimacy theory as an interpretative key for examining the results of the empirical analysis. Section 4 explains the methodology, while Section 5 presents the results of this study. The final section discusses the results, draws some conclusions, and offers directions for future research; it also describes the limitations of the present study.

2 | HARMONIZATION IN PUBLIC SECTOR ACCOUNTING

Harmonization in public sector accounting began almost 40 years ago both nationally and internationally and was followed by an increased emphasis on the international level. In fact, following a well-established trend in the private sector, several standard boards were created (e.g., AASB, GASB, and IPSASB) with the aim of establishing a common language for public sector entities worldwide to generate high-quality comparable data, foster common policies and common markets, facilitate access to financial markets, and improve financial and public accountability (Caperchione & Salvatori, 2012; Gomes et al., 2015; Kober et al., 2010; Manes-Rossi et al., 2016). A common set of accounting principles can also favor the training of professionals and managers (Adams et al., 2020) and enhance their ability to prepare and audit public-sector financial reports (Ball, 2012).

Scholars have highlighted that the harmonization process is strictly related to the adoption of the accrual basis of accounts, which has been considered an unavoidable trend (Lapsley et al., 2009). Despite some resistance by countries that consider a cash basis, commitment basis, or modified cash basis as part of their cultural tradition (Christiaens et al., 2010, 2015; Oulasvirta, 2014; Pina & Torres, 2003; Polzer & Reichard, 2020) and varying intensities of implementation (Adhikari & Gårseth-Nesbakk, 2016), the move toward accruals seems to have prevailed (IFAC/CIPFA, 2021). Furthermore, accrual accounting has frequently been associated with the implementation of International Public Sector Accounting Standards (IPSAS; Biondi, 2014), and several countries have implemented accounting reforms by introducing IPSAS-like standards (Brusca et al., 2021). There is growing interest in IPSAS, and their widespread adoption is expected to take place in the next few years (IFAC/CIPFA, 2021). Part of this interest is also attributed to the European Public Sector Accounting Standards (EPSAS) project that is underway in the European Union, with intense debate over the need for and usefulness of adopting this set of standards inspired by IPSAS (Dabbicco & Steccolini, 2020; Manes-Rossi et al., 2021).

Nonetheless, some national resistance persists due to cultural factors (Oulasvirta, 2014, 2021), national authorities' fear of losing control over public sector financial reporting and their sovereign rights (Heald & Hodges, 2015), and the cost of training civil servants and changing accounting systems (PwC, 2014).

The extensive debate on international harmonization in public sector accounting, particularly with respect to the IPSASB's activities (Christiaens et al., 2015; Polzer et al., 2020; Schmidhuber et al., 2022), requires a more in-depth analysis of and reflection on the due process followed by international standard setters to investigate whether the participation of different respondents would allow the IPSASB to gain broad consensus and, possibly, widespread application of the standards issued.

3 | PARTICIPATION IN INTERNATIONAL ACCOUNTING STANDARD-SETTING

The accounting standard-setting process is not only a technical activity that aims to identify the best accounting practices but also a political process, as it involves making decisions from various options that reflect the interests of different parties (Fogarty et al., 1994; Reuter & Messner, 2015; Sutton, 1984; Watts and Zimmerman, 1978). To ensure a broad application of the standards issued, international accounting standard setters have to face legitimacy challenges. According to Suchman (1995, p. 574), legitimacy is the "generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions." Hence, legitimacy is the result of an audience's reaction to the appropriateness of an organization's action. With specific reference to standard-setting institutions, legitimacy issues mainly stem from the absence of a democratic foundation, as they are self-mandated and work in the absence of a political mandate, failing to meet the requirement of traditional representative democracy (Richardson & Eberlein, 2011; Wallace, 1990). Thus, for standard-setting institutions to survive, it is important that their legitimacy is strengthened in the eyes of stakeholders (Durocher & Fortin, 2011; Wallace, 1990).

Richardson and Eberlein (2011) offered a processual view of legitimacy by distinguishing *input*, *throughput*, and *output* legitimacies. Input legitimacy concerns the participation of the affected parties or the involvement of the representatives of interest groups; throughput legitimacy regards the fairness of the transformation of inputs into outputs; finally, output legitimacy is about the successful discharge of appropriate outcomes. According to this approach, legitimacy may be achieved through the characteristics of the three stages of the standard-setting process (Sanada, 2020).

In this study, we focus on input legitimacy. The literature suggests that to achieve input legitimacy, widespread participation of the constituents, in terms of their geographical diversity and nature, is necessary (Johnson & Solomons, 1984; Jorissen et al., 2012, 2013; Larson, 2007; Richardson, 2008; Richardson & Eberlein, 2011; Wallace, 1990). In particular, participation is analyzed with reference to comment letters submitted in response to published consultation papers and exposure drafts. Comment letters represent a form of participation that is readily available, as they are published on the standard setter's website. As such, comment letters have been widely studied by scholars interested in analyzing legitimacy and participation in accounting standard-setting at both the national and international levels (e.g., Chatham et al., 2010; Jorissen et al., 2012, 2013; Larson, 2007; Tutticci et al., 1994). With specific reference to the latter, most studies have focused on the development of accounting standard-setting for the private sector (Chatham et al., 2010; Jorissen et al., 2012, 2013; Sutton, 1984), while only a few have investigated the participation of constituents during the international standard-setting process for the public sector (Anessi-Pessina et al., 2020; Aversano et al., 2019; Bisogno et al., 2015; De Wolf et al., 2021; Kidwell & Lowensohn, 2018, 2019; Manes-Rossi & Aversano, 2015).

This study relies on the cost–benefit model developed by Sutton (1984) that views the accounting standard-setting process primarily as a political or economic process, rather than a technical one. The model extends the single-period voting model developed by Downs (1957) by applying a cost–benefit framework to lobby activities. According to Sutton's model, individuals will participate in a process in which they can state whether the perceived benefits outweigh the cost, once they have considered their likelihood of influencing the result. With respect to standard-setting, benefits are related to the impact that submitting a comment letter may have on the content and characteristics of the final standards, while costs include the time and effort needed to understand the document and draft comment letters.

The cost incurred by constituents for participating in the process of international standard-setting may differ among countries, and this may bias their participation.

Previous studies on the public sector have already underlined an unequal geographical distribution of respondents in the consultation process activated by the IPSASB (Bisogno et al., 2015; De Wolf et al., 2021; Manes-Rossi & Aversano, 2015). Several factors may account for the differences in participation among the countries.

International standard-setting is characterized by the use of the English language. Previous studies have shown that a country's capacity to participate is affected by its familiarity with English (Jorissen et al., 2013), and this could create a barrier for the country's participation in the process. Moreover, IPSAS are accrual-based and aim to promote the adoption of an accrual basis of accounting worldwide (IPSASB, 2019). While the introduction of accrual accounting in the public sector is one of the tools promoted over recent decades under the NPM reform wave (Anessi-Pessina & Steccolini, 2007; Broadbent & Guthrie, 2008; Lapsley et al., 2009), several studies have shown that the transition from traditional public sector accounting to accrual accounting is far from being complete, with the majority of countries reporting exclusively on a cash basis or on a cash basis with some elements of accrual accounting (Christiaens et al., 2015; IFAC/CIPFA, 2021). In addition, several differences may be noticed among the countries that have adopted accrual accounting as far as their implementation of IPSAS is concerned (Bisogno & Cuadrado-Ballesteros, 2020; Polzer et al., 2020; IFAC/CIPFA, 2021). In some cases, IPSAS have been fully adopted with no modification, while in others, they have been adapted to the local context or used as a reference point for national standards. Finally, some countries and organizations have rejected IPSAS. These considerations point to the fact that the level of familiarity with accrual accounting on the one hand, and with IPSAS on the other, varies among countries. Thus, it may be assumed that actors in countries with cash-based accounting systems or with an accrual system that is not inspired by the IPSASB will incur higher participation costs and are not well equipped to take part in the debate.

However, it may also be assumed that countries that are planning to implement accrual accounting systems may see participation in IPSASB's consultations as an opportunity to discuss and reflect on issues related to accrual accounting, and thus perceive that their participation brings greater benefits than costs. Against this backdrop, the following research questions are examined:

RQ1: Are there differences in the level of participation among respondents from different countries?

RQ2: Are these differences, if any, explained by familiarity with the English language, accrual accounting, or the level of IPSAS adoption?

Participation can also be analyzed with respect to the nature of constituents submitting comment letters. In general, the objective of financial reporting both in the private and public realm is to provide information that is useful to users. However, along with users, other major constituents of an international accounting standard setter include preparers, the accounting profession, and regulators (Wallace, 1990). Drawing on Sutton's model, this imbalance may be due to the fact that these categories of constituents receive higher potential benefits from securing their favored proposal and thus are particularly motivated to participate. A large number of studies have documented that the majority of letters submitted to private-sector standard setters come from preparers and those in the accounting profession (e.g., Chatham et al., 2010; Jorissen et al., 2012). Albeit very limited, evidence collected about stakeholder participation in the public context points to similar results, showing that governmental and professional organizations are the most prolific respondents (Bisogno et al., 2015; Kidwell & Lowensohn, 2018, 2019; Manes-Rossi & Aversano, 2015). In accordance with Sutton's model and empirical evidence, the following research question is also investigated:

RQ3: Are there differences in the level of participation by type of respondents?

Through comment letters, participants express their position on an early version of an accounting standard. Following Sutton (1984), the participation of "affected parties" in the process of accounting standard-setting is more than just casting votes, as it gives participants the means to actively influence the process of standard-setting. Participants can put forward new alternatives, and the probability of being heard also depends on the type and strength of the arguments employed (Tutticci et al., 1994). With respect to input legitimacy, this underlines the need to consider not only the position of respondents as regards votes (for, against, neutral) but also the arguments used by stakeholders, by analyzing their response strategies (Tutticci et al., 1994). Previous studies on comment letters to the IPSASB have usually focused on a single document and highlighted issues pertinent to a specific proposal (Aversano et al., 2019; Bisogno et al., 2015; De Wolf et al., 2021), thus failing to provide a categorization of arguments used by respondents applicable to a range of accounting documents. As there is little knowledge of the types of input received by the IPSASB in the due process through comment letters, the following research questions are additionally explored:

RQ4: What is the level of support (opposition) to the issues raised by the IPSASB in documents released for comments? Is there any difference among constituents and geographical areas?

RQ5: What are the main arguments raised by the respondents in their comment letters? Is there any difference by constituents and geographical areas?

4 | RESEARCH METHOD

The study is based on an analysis of comment letters submitted to the IPSASB for six projects between 2017 and 2020 and available on the board's website. The comment letters included in the analysis were written in response to three consultation papers (heritage assets, measurement, and revenues and non-exchange expenditure) and three exposure drafts (revenue with performance obligations, revenue without performance obligations, and transfer expenses).

Several reasons accounted for the decision to focus the analysis on these documents. First, all the six projects relate to the development of standards addressing issues specific to the public sector (IPSASB, 2019), which frequently does not have specific private-sector counterparts to adhere to. Second, these projects, with the exception of the consultation paper on heritage assets, were not covered in the multi-period and multi-issue analysis recently published by Kidwell and Lowensohn (2019).

To explore RQ1, comment letters were classified according to the geographical origin of the respondents. Participants of an international nature or present in more than one country were categorized as "International." RQ2 was investigated through a regression model, with the participation of each country being the dependent variable, measured as the number of letters submitted by constituents in a country. The independent variables were familiarity with the English language, level of IPSAS adoption, and level of accrual accounting implementation. Familiarity with English was expressed through a dichotomic variable with the value of 1 if English was the first or second official language, or otherwise 0. To measure the level of IPSAS adoption, this study relied on IFAC/CIPFA (2021). More specifically, and following previous studies in which multi-level classification was used (Bisogno & Cuadrado-Ballesteros, 2020; Christiaens et al., 2015), three dummy variables were created: FULL_IPSAS, with the value of 1 when IPSAS were adopted with no modifications, or otherwise 0; PART_IPSAS, with the value of 1 when IPSAS were adapted to the local context, or national standards used IPSAS or IFRS as a benchmark¹, or otherwise 0; and NO_IPSAS, with the value of 1 when a country did not refer to IPSAS in its national standards, or otherwise 0. The IFAC (2021) report was also used to measure the implementation of accrual accounting, creating three dummy variables (FULL_ACCRUAL; PART_ACCRUAL; NO_ACCRUAL) to pinpoint the type of accounting basis used in a country.

To investigate RQ3, comment letters were classified according to the nature of the respondents. Drawing on previous classifications (Bisogno et al., 2015; De Wolf et al., 2021; Manes-Rossi & Aversano, 2015), the respondents were classified as governmental organizations, professional associations, standard setters, international organizations, audit/consulting firms, supreme audit institutions, academics, interested groups, and others.

Content analysis was used to investigate RQ4 and RQ5. Content analysis is a research approach that allows text to be codified into various categories and is considered particularly suitable in the case of a large quantity of qualitative information (Campbell, 2017; Krippendorff, 1980). Specifically, a human-based content analysis of 319 comment letters was carried out, in accordance with a codifying scheme based on previous studies (e.g., Chatham et al., 2010; Jorissen et al., 2013; Kidwell & Lowensohn, 2019). The authors independently analyzed and coded the letters in a spreadsheet. They discussed their work on a regular basis to resolve questions and address divergent coding. Agreement/disagreement and the arguments used by the respondents to support their expressed position were coded for every comment letter submitted with respect to each issue for which the IPSASB was seeking comments. This approach was intended to overcome the difficulty and subjectivity of assessing the overall position of response letters. Each response, in accordance with the tone and extension of the comments provided, was categorized as follows: "disagreement" (with or without proposals), "partial agreement," or "agreement" (with or without comments). A further category (labeled "no comments") was included, as some respondents did not structure their response letters around specific questions raised by the IPSASB in the project or did not address some of the questions. A final category, labeled "not applicable," was considered because, in some documents, IPSASB did not ask respondents to express agreement or disagreement, but merely their opinions regarding the various options illustrated in the document.

Bearing in mind the aim of this study, the arguments used by the respondents to back their positions were categorized by combining prior knowledge and issues emerging during the analysis of the comment letters (Campbell, 2017; Chatham et al., 2010; Holder et al., 2013). The categories developed were sufficiently broad to cover a wide spectrum of issues highlighted by the respondents and, at the same time, to grasp transversal aspects consistent with the multi-issue approach of the analysis. Accordingly, the analysis was based on the following categories: convergence between IPSAS and IFRS, consolidation issues, convergence with government finance statistics, alignment with the conceptual framework, coherence with other standards or within the same document, convergence between IPSAS and national accounting standards, the need for clarification (meaning that additional guidelines, examples, and clarification were

TABLE 1 Specific matters for comments and preliminary views of each document analyzed

Contents of CP/ED	CP			ED			Total
	H	M	R	70	71	72	
(A) Specific matter for comments	5	3	7	5	7	9	36
(B) Preliminary view	8	11	9	0	0	0	28
(C) Total No. of questions (A + B)	13	14	16	5	7	9	64
(D) No. of respondents	47	32	38	73	65	64	319
(E) Total no. of comments analyzed (C × D)	611	448	608	365	455	576	

Note: H = CP on heritage assets; M = CP on measurement; R = CP on revenue and non-exchange expenditure; 70 = ED 70, revenue with performance obligations; 71 = ED 71, revenue without performance obligations; 72 = ED 72 transfer expenses. Abbreviations: CP, consultation papers; ED, exposure drafts.

required), and others (including compliance costs). Cross-tabulation was used to examine relationships between the tone and arguments adopted, the type of constituents, and their geographical area.

5 | RESULTS

Table 1 summarizes the content of each consultation paper and exposure draft, showing both the specific matters for comments and preliminary views of each document.

It should be noted that while specific matters for comments require respondents to express the extent to which they agree/disagree with specific issues, preliminary views often require general comments without asking whether the respondent agrees or not. Such situations were classified as “not applicable” (NA), and they were summed up as cases labeled “no response” (NR).

As for the three consultation papers, the level of participation was higher in the *heritage assets* consultation, probably because it is a matter of considerable dispute, which has aroused close attention from both scholars (Adam et al., 2011; Aversano & Christiaens, 2014; Barton, 2000, 2005; De Wolf et al., 2021) and the world of practice (e.g., LASAAC, 2012) to the problem surrounding measurement and disclosure of heritage assets. The *measurement* consultation paper received fewer responses than the other documents, probably because of its conceptual nature. Furthermore, the high level of participation in the three exposure drafts may be due to the fact that they were part of the same project and published together and also dealt with public sector-specific issues.

5.1 | Level of participation by geographical area

To investigate RQ1, the respondents were first classified according to their geographical area, as shown in Table 2.

Overall, the majority of the respondents belonged to the “international” category, as several international organizations had been involved in the debate regarding exposure drafts 70, 71, and 72 (as explained in the following section). Respondents from Oceania actively participated especially in the consultation papers on *measurement* and *revenue*. The significant percentage of respondents from the European context—a variegated context, where countries adopting cash-based and accrual-based systems coexist—can be attributed to the ongoing debate about the development of EPSAS by the European Union (Manes-Rossi et al., 2021), as demonstrated by five out of six documents submitted by the European Commission (see Appendix 1). It is finally worth noting the increasing participation of respondents from Central/South America, as 12 countries of this area formed an organization named “Foro de Contadurías Gubernamentales de América Latina” (FOCAL) that individually provided a specific response to the different matters for comment.

TABLE 2 Classification of respondents by geographical area

Geographical areas	Consultation papers						Exposure drafts							
	H		M		R		70		71		72		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Africa	5	10.6	5	15.6	4	10.5	8	11.0	7	10.8	8	12.6	37	11.6
Asia	4	8.5	4	12.5	4	10.5	5	6.8	5	7.7	5	7.8	27	8.5
Europe	11	23.4	6	18.8	10	26.3	9	12.3	8	12.3	7	10.9	51	16.0
Central/South America	8	17.0	1	3.1	1	2.6	13	17.8	13	20.0	11	17.2	47	14.7
North America	4	8.5	3	9.4	2	5.2	8	11.0	9	13.8	7	10.9	33	10.3
Oceania	9	19.2	8	25.0	10	26.3	8	11.0	8	12.3	10	15.6	53	16.6
International	6	12.8	5	15.6	7	18.4	22	30.1	15	23.1	16	25.0	71	22.3
Total	47		32		38		73		65		64		319	

To investigate RQ2, the comment letters were classified by focusing on the participation level of each country² to which respondents belonged. We found that comment letters received by the IPSASB were submitted by respondents from 37 countries; in particular, more than 20 letters were submitted by respondents from Canada, Australia, and New Zealand, followed by UK respondents, with 16 letters. A regression analysis was carried out to test the effects of familiarity with the English language (*Eng*), the level of IPSAS implementation (*IPSAS*), and accrual-accounting adoption (*Accrual*) on the level of participation (expressed through the number of comment letters: *CL*). Considering that *IPSAS* and *Accrual* variables were highly associated³, two models were implemented to enter them individually. Furthermore, GDP per capita (*GDPpc*) was used as a control variable (Cuadrado-Ballesteros & Bisogno, 2021). Thus, the models took the following form:

$$CL = \beta_0 + \beta_1 Eng + \beta_2 FULL_IPSAS + \beta_3 PART_IPSAS + \beta_4 GDPpc + \varepsilon_{it}, \quad (1)$$

$$CL = \beta_0 + \beta_1 Eng + \beta_2 FULL_ACCRUAL + \beta_3 PART_ACCRUAL + \beta_4 GDPpc + \varepsilon_{it}. \quad (2)$$

As Table 3 illustrates, familiarity with the English language was significant at a 1% level in both models, confirming the findings of previous studies (De Wolf et al., 2021; Jorissen et al., 2013), meaning that costs of participation are low for English-speaking countries. Regarding the level of IPSAS implementation, countries classified as IPSAS adopters participated more in the IPSASB's consultation.

This result highlights that differences among countries in terms of IPSAS implementation matter, as previous studies have documented (Bisogno & Cuadrado-Ballesteros, 2020; Polzer et al., 2020). With regard to familiarity with accrual accounting, respondents from countries characterized by a partial implementation seemed to be more inclined to participate in the consultation, probably because higher benefits of participation are perceived.

5.2 | Level of participation by category of respondents

To investigate RQ3, the respondents were classified according to the category of respondent, as illustrated in Table 4.

Governmental organizations were the most active respondents, particularly with respect to the three exposure drafts, confirming findings that have emerged from previous studies (Bisogno et al., 2015; Manes-Rossi & Aversano, 2015). As already observed, the high number of comment letters submitted for the exposure draft consultations was

TABLE 3 Regression model

Variables	Model 1		Model 2	
	Coeff.	Std. Err.	Coeff.	Std. Err.
Cons	0.0209	1.6983	1.1956	2.5460
Familiarity with English (Eng)	6.1718***	1.6872	5.4569***	1.8508
<i>IPSAS (reference category NO_IPSAS)</i>				
– FULL_IPSAS	6.6241***	1.7551		
– PAR_IPSAS	2.3431	2.5505		
<i>Accrual (reference category NO_ACCRUAL)</i>				
– FULL_ACCRUAL			0.7386	2.7618
– PART_ACCRUAL			5.0847*	2.4972
GDP per capita	0.0003	0.0003	0.0000	0.0000
No. of observations	35		35	
Adjusted R-squared	0.38		0.24	

Note: that *, **, and *** represent significance at 10%, 5%, and 1%, respectively.
Abbreviations: Coeff., coefficient; Std. Err., standard error.

due to the increasing involvement of Latin American countries belonging to FOCAL. These countries were coded in the “governmental organization” category as they contributed individually to the consultation. This helps to explain the higher incidence of this category compared with the findings from previous studies, such as that of Kidwell and Lowensohn (2019).

An active role was also played by professional associations and standard setters, followed by international organizations, which participated particularly in the debate regarding exposure draft 70, *Revenue with performance obligations*. Indeed, revenue recognition is a matter under debate, with a critical issue being the distinction between conditional and non-conditional contributions received by international organizations (Bergmann & Fuchs, 2017).

Several studies have documented more intense participation by preparers and the accounting profession as compared to users, and this result has been attributed to the fact that the former groups receive higher potential benefits from securing their favored proposal (Jorissen et al., 2012; Sutton, 1984). Moreover, while some respondents participated and commented on each document included in the analysis, submitting six comment letters, others provided comments only to some of them. For instance, among the standard setters, five out of 12 systematically submitted comment letters to all the documents (see Appendix 1). Furthermore, the constant involvement of the Taskforce IRSPM A&A SIG⁴, CIGAR Network⁵, and EGPA PSG XII⁶, which consists of a group of academics affiliated to the three networks, can be observed, indicating continuous attention by the academic community.

5.3 | Type of support by respondents

Following previous studies (Tutticci et al., 1994) that suggested avoiding using classifications merely based on the vote (for, against, neutral), the position of respondents was classified by scrutinizing their comments and proposals. Accordingly, Table 5 illustrates the level of support or opposition to the issues raised by the IPSASB to address RQ4.

The results showed that the respondents agreed with the IPSASB in approximately 40% of the cases and did not provide any additional comments or recommendations to support their positions. A high percentage of responses was assigned to the category “agree with comments,” highlighting that although the respondents agreed with the approach proposed in the documents, they were still interested in providing additional explanations and suggestions (in about

TABLE 4 Classification of respondents by category

Category of respondents	Consultation papers				Exposure drafts							
	H		M		R		70		71		72	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Governmental organizations	16	34.0	5	15.6	10	26.3	22	30.2	25	38.5	25	39.1
Professional associations	12	25.6	9	28.1	8	21.1	15	20.6	12	18.5	13	20.3
Standard setters	7	14.9	7	21.9	7	18.5	9	12.3	9	13.8	9	14.0
International organizations	3	6.4	2	6.3	4	10.5	17	23.3	9	13.8	8	12.5
Audit/consulting firms	3	6.4	5	15.6	6	15.8	4	5.5	4	6.2	4	6.2
Supreme audit institutions	3	6.4	0	0.0	1	2.6	2	2.7	2	3.1	3	4.7
Academics	1	2.1	1	3.1	1	2.6	2	2.7	1	1.5	1	1.6
Interested groups	1	2.1	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Others	1	2.1	3	9.4	1	2.6	2	2.7	3	4.6	1	1.6
Total	47		32		38		73		65		64	

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TABLE 5 Type of support expressed by respondents for each CP and ED

	Consultation papers				Exposure drafts								Total	
	H	M		R	70		71		72					
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
No comments	8	2.4	35	8.9	29	7.9	41	11.7	53	12.2	18	3.8	184	7.8
Disagreement														
• Without proposals	12	3.6	2	0.5	8	2.2	0	0.0	5	1.2	7	1.5	34	1.5
• With proposals	71	21.4	45	11.4	50	13.7	42	12.0	95	21.9	69	14.7	372	15.9
Partial agreement	34	10.2	20	5.1	32	8.8	20	5.7	52	12.0	35	7.4	193	8.2
Agreement														
• With comments	99	29.8	120	30.5	94	25.8	94	26.9	91	21.0	144	30.6	642	27.4
• Without comments	108	32.5	172	43.7	152	41.6	152	43.6	138	31.8	197	41.9	919	39.2
Total*	332	100	394	100	365	100	349	100	434	100	470	100	2,344	100.0

*Categories “no response” and “not applicable” are not included to preserve readability.

27% of the cases). The respondents expressed their disagreement without adding comments in very few of the cases (1.5%), while in about 16% of the cases they provided several reasons to support their disagreement, implying that they had raised doubts or asked for clarification.

Tables 6 and 7 present the types of support expressed by the different categories and geographical area of respondents, respectively. Professional associations and audit/consulting firms agreed, as did governmental organizations, while national standard setters mainly disagreed, providing proposals frequently linked to their national experience, or partially agreed, providing additional comments and suggestions.

The “agreement without comments” position was often found while analyzing the comment letters of respondents from Africa and Asia, probably because the accounting tradition of countries belonging to these areas is less deeply rooted than that of the other geographical areas. In fact, respondents from the other areas provided additional comments even though they agreed in more than 30% of the cases; for example, European respondents fell in the “agree with comments” category in approximately 33% of the cases.

The most critical position was held by the respondents in Oceania, who disagreed with the proposals in approximately 26% of the cases. As mentioned earlier, the familiarity with the English language of respondents from Australia and New Zealand may have been an explanatory factor, coupled with their familiarity with accrual accounting systems, so they illustrated their experience by comparing their approaches explicitly with those proposed by the IPSASB.

5.4 | Arguments raised by respondents

In addition to an assessment of the agreement/disagreement expressed by the constituents, the analysis covered the main arguments provided by the respondents to support their positions (RQ5), as illustrated in Table 8.

Most of the arguments (approximately 51%) used by the respondents concentrated on requests for clarification: additional examples and guidelines were frequently required, coupled with amendments of expressions used in the CP/ED because of the potential ambiguity of the wording. Clarification was required regarding certain definitions (e.g., those concerning “binding arrangement” in exposure drafts 70 and 71 and “specified activity” and “eligible expenditure” in exposure draft 71). The respondents frequently underlined the importance of coherence, particularly with the definitions and concepts included in exposure drafts 70, 71, and 72, with the aim of ensuring a consistent interpretation and application of the three documents.

The respondents also required more coherence as a result of some underlined inconsistencies within the same document or between the proposed documents and other IPSAS. Other issues (which accounted for 10%) were the complexity of the documents and the high cost of implementation as compared to the benefits for stakeholders. The respondents also highlighted the need for documents to be coherent with the principles and definitions of the conceptual framework (e.g., the definition of assets and liabilities).

Tables 9 and 10 provide a more in-depth analysis of the arguments used by the respondents to support their position. Table 9 highlights that requests for clarification were the most recurrent arguments raised by all categories of stakeholder, especially by governmental organizations, standard setters, and professional associations. This may be due to the fact that such categories of respondents were more directly involved in the application of the final standards. Requests for coherence were expressed by the respondents from all categories.

Table 10 shows that the need for clarification was the main argument raised by the respondents from all geographical areas. Furthermore, it illustrates that the coherence with national approaches and the relevance of public sector-specific issues were raised in particular by respondents in Oceania. This behavior could be explained by the accrual accounting maturity of these respondents. In contrast, European respondents underlined the need to align with other IPSAS and conceptual framework principles.

TABLE 6 Type of support expressed by different categories of respondents

Category of respondents	Disagreement						Agreement						First total	NR NA	Second total
	No comments		Without proposals		With proposals		Partial agreement		With comments		Without comments				
Governmental organization	60	9	16	2	111	17	73	11	164	25	243	36	667	88	755
Professional association	27	5	5	1	60	10	38	7	145	25	301	52	576	53	629
Standard setter	11	3	6	2	84	22	41	11	131	35	104	28	377	61	438
International organization	55	18	4	1	37	12	17	6	70	23	117	39	300	22	322
Audit/consulting firm	17	7	0	0	23	10	8	3	77	34	104	45	229	48	277
Supreme audit institution	3	3	1	1	27	31	8	9	19	22	29	33	87	8	95
Academics	0	0	1	2	17	28	5	8	28	47	9	15	60	6	66
Interested group	0	0	1	11	3	33	1	11	3	33	1	11	9	0	9
Other	11	28	0	0	10	26	2	5	5	13	11	28	39	38	77
Total	184		34		372		193		642		919		2,344	324	2,668

Note: Percentages were calculated referring each value to the respective first total (NR/NA not included)

TABLE 7 Type of support expressed by geographical area of respondents

	Disagreement						Agreement						First total	NR/NA	Second total
	No comments		Without proposals		With proposals		Partial agreement		With comments		Without comments				
			No.	%	No.	%			No.	%	No.	%			
Geographical area	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	No.	No.
Africa	8	3	3	1	34	11	11	4	71	23	182	59	309	31	340
Asia	35	16	3	1	32	15	16	7	36	17	92	43	214	39	253
Europe	26	6	8	2	51	12	37	9	143	33	169	39	434	62	496
Central/South America	63	12	5	1	65	12	29	5	171	32	203	38	536	49	585
North America	12	5	1	0	42	19	39	18	54	24	74	33	222	21	243
Oceania	23	6	9	2	94	26	35	10	93	25	112	31	366	100	466
International	17	6	5	2	54	21	26	10	74	28	87	33	263	22	285
Total	184		34		372		193		642		919		2.344	324	2.668

Note: Percentages were calculated referring each value to the respective first total (NR/NA not included)

TABLE 8 Arguments used by respondents

Arguments	Consultation papers						Exposure drafts						Total	
	H		M		R		70		71		72			
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%		
Convergence between IPSAS and IFRS	1	0.7	21	6.3	21	5.8	1	1.0	2	0.8	3	1.2	49	3.4
Consolidation issues	0	0.0	0	0.0	4	1.1	0	0.0	4	1.6	21	8.4	29	2.0
convergence with government finance statistics	0	0.0	10	3.0	11	3.0	0	0.0	1	0.4	0	0.0	22	1.5
Public sector-specific issues	16	10.8	15	4.5	48	13.3	9	8.7	12	4.9	20	8.0	120	8.3
Alignment with IPSASB's CF	36	24.3	0	0.0	48	13.3	6	5.8	14	5.7	19	7.6	123	8.6
Coherence with other standards or within the same document	33	22.3	28	8.5	23	6.4	9	8.7	31	12.7	23	9.2	147	10.2
Coherence with national approaches	8	5.4	21	6.3	12	3.3	7	6.8	12	4.9	9	3.6	69	4.8
Need for clarification	46	31.1	214	64.7	161	44.5	69	67.0	132	54.1	112	44.8	734	51.0
Others	8	5.4	22	6.6	34	9.4	2	1.9	36	14.8	43	17.2	145	10.1
Total	148		331		362		103		244		250		1438	

TABLE 9 Arguments used by respondents classified by category of respondents

Category of respondents	Convergence between IPSAS and IFRS				Convergence with government finance statistics				Public sector-specific issues				Alignment with IPSASB's CF				Coherence with other standards or within the same with national approaches				Need for clarification				Others				Total			
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Governmental organizations	7	2.0	15	4.3	3	0.9	3	0.9	37	10.7	21	6.1	29	8.4	24	6.9	171	49.3	40	11.5	347	100										
Professional associations	17	5.3	4	1.2	2	0.6	2	0.6	12	3.7	35	10.9	26	8.1	21	6.5	176	54.7	29	9.0	322	100										
Standard setters	9	2.8	3	0.9	3	0.9	3	0.9	30	9.2	30	9.2	50	15.3	13	4.0	169	51.7	20	6.1	327	100										
International organizations	6	4.9	2	1.6	14	11.5	14	11.5	13	10.7	7	5.7	9	7.4	2	1.6	49	40.2	20	16.4	122	100										
Audit/consulting firms	7	4.1	3	1.7	0	0.0	0	0.0	9	5.2	12	7.0	15	8.7	2	1.2	107	62.2	17	9.9	172	100										
Supreme audit institutions	0	0.0	0	0.0	0	0.0	0	0.0	12	20.0	6	10.0	11	18.3	5	8.3	26	43.3	0	0.0	60	100										
Academics	0	0.0	2	3.9	0	0.0	0	0.0	7	13.7	9	17.6	4	7.8	2	3.9	23	45.1	4	7.8	51	100										
Interested groups	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	1	20.0	0	0.0	0	0.0	4	80.0	5	100										
Others	3	9.4	0	0.0	0	0.0	0	0.0	0	0.0	3	9.4	2	6.3	0	0.0	13	40.6	11	34.4	32	100										
Total	49		29		22		22		120		123		147		69		734		145		1,438											

Note: Percentages were calculated, for each geographical area/category of stakeholders, by dividing the number of times a specific argument was raised by the total number of arguments raised.

TABLE 10 Arguments used by respondents classified by geographical area

Geographical area	Convergence between IPSAS and IFRS		Convergence with government finance statistics		Public sector-specific issues		Alignment with IPSASB's CF		Coherence with other standards or within the same document		Coherence with national approaches		Need for clarification		Others		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Africa	2	1.2	1	0.6	0	0.0	8	4.7	17	9.9	25	14.5	0	0.0	104	60.5	15	8.7
Asia	3	2.2	1	0.7	1	0.7	8	5.9	9	6.6	11	8.1	10	7.4	78	57.4	15	11.0
Europe	11	4.4	5	2.0	3	1.2	17	6.8	28	11.2	35	14.1	10	4.0	119	47.8	21	8.4
Central/South America	2	1.4	9	6.4	1	0.7	21	14.9	4	2.8	4	2.8	14	9.9	71	50.4	15	10.6
North America	3	2.5	1	0.8	0	0.0	7	5.7	12	9.8	19	15.6	5	4.1	63	51.6	12	9.8
Oceania	13	4.4	4	1.4	1	0.3	33	11.2	26	8.8	28	9.5	27	9.2	124	42.2	38	12.9
International	15	4.6	8	2.5	16	4.9	26	8.0	27	8.3	25	7.7	3	0.9	175	54.0	29	9.0
Total	49		29		22		120		123		147		69		734		145	

Note: Percentages were calculated, for each geographical area/category of stakeholders, by dividing the number of times a specific argument was raised by the total number of arguments raised.

6 | DISCUSSION AND CONCLUSION

The harmonization process in public sector accounting has increased its pace of implementation over the last few years, with the aim of creating a global accounting architecture in the public sector. The IPSASB has driven this process by preparing a set of international accounting standards to be applied by public sector entities on the basis of the accrual system. It is important to note that the board develops standards which offer options to be applied. The IPSASB does not have legislative power and, consequently, it needs to acquire legitimation and consensus when formulating its standards to facilitate their application.

To this end, the IPSASB follows due process aimed at collecting suggestions and comments on the early draft of each standard. The literature analyzing the due process followed by the IPSASB and the role of constituents is still scarce. To fill this gap, in this study, we have investigated the typology of respondents, their geographical area, their agreement/disagreement, and the arguments that are important to them through an analysis of comment letters submitted for six projects launched between 2017 and 2020 by the IPSASB.

A profile analysis of the respondents revealed that the number of constituents who had submitted a comment letter progressively increased over the period under analysis. However, some imbalance persists, with some geographical areas (in particular Europe and Oceania) being more active than others. Familiarity with the English language and the level of IPSAS/accrual implementation may contribute to explaining these different levels of participation.

Most of the comment letters came from governmental organizations, professional associations, standard setters, and international organizations. This can be attributed to the fact that these four categories of respondent are in charge of implementing, adapting, and applying IPSAS. Thus, the cost-benefit equilibrium (Sutton, 1984) incentivizes their involvement in the due process, playing a fundamental role in legitimizing the international standards. These groups of respondents made constant attempts to promote changes in the documents, first to attain clear standards and then to ensure coherence among the whole set of principles and standards, while also considering public sector-specific issues. However, only a small number of constituents systematically participated in the process.

These results suggest that, to avoid bias due to the under-representation of some groups and/or geographical distortion (Jorissen et al., 2012), the IPSASB could further strengthen the participation of different stakeholder groups to enhance its legitimacy, such as by adopting user-orientated strategies (Sanada, 2020).

With respect to the content of the comment letters submitted, the analysis revealed that the respondents agreed with the standard setters. However, while the respondents from countries with limited public sector accounting traditions expressed their agreement without providing any further explanation of their position, the respondents from countries with considerable experience in the use of accrual-based standards presented richer arguments while participating in the due process and drew the board's attention to the expertise of their countries. This result confirms that constituents with greater experience and knowledge were more equipped to provide standard setters with more detailed comments (Bamber & McMeeking, 2016). However, this might be a limitation, as the board did not receive inputs from countries with less experience and thus was likely to ignore the specific information needs related to such contexts. To contrast such a limitation and increase input legitimacy among these countries, the board could once again implement targeted strategies devised to enhance the number and quality of inputs by constituents.

With specific reference to the arguments raised by the constituents, some common trends could be highlighted. The request for further clarification and the need for greater coherence with the contents of the conceptual framework and the other existing IPSAS can also be considered an expression of the constituents' need, at the end of the process, to receive a corpus of standards that can be implemented (with some adaptations, if required) with limited uncertainty and the support of guidance and examples that can reduce the cost of implementation. These results also confirm the reasoning underpinning the cost-benefit model proposed by Sutton (1984), as participants prefer to incur the cost of preparing answers to documents under consultation to gain future benefits when they have to implement the final standard. The research allows us to conclude that a variegated group of constituents provided suggestions and expressed their stance with respect to the questions raised. Nonetheless, further strategies and action can be enacted

by the IPSASB to overcome the cost-benefit imbalance faced by some groups of constituents, in order to gain further inputs and improve legitimacy.

From a research viewpoint, the contribution of the study is manifold. First, the study contributes to the still limited literature investigating accounting standard-setting in the public sector domain. Second, this study is one of the few existing studies that attempts to analyze the due process of IPSAS by adopting a multi-item approach, with the aim of covering all accounting documents dealing with specific issues in the public sector. Finally, the study offers a better understanding not only of the tone of the responses but also of the main arguments used by the respondents to support their position, through an in-depth classification. Furthermore, by adopting the cost-benefit model proposed by Sutton (1984), this study provides new insights into possible factors that could stimulate/obstruct the participation of constituents in the consultation process. The analysis provides stimulus for academics to investigate if the level of input legitimacy gained so far by the IPSASB can ensure a wide consensus of the standards issued.

From a policy viewpoint, the study shows how international accounting standard-setting is attracting attention from potential constituents and highlights the main reasons underlying the position of those submitting comment letters. This may help in the formulation of international standards that take into consideration the main issues of importance to stakeholders. Moreover, the intense participation of standard setters and governmental organizations supports the claim that setting accounting standards is not only a technical but also a political issue, as it can potentially affect how public entities can measure and represent their financial conditions and, in turn, have consequences for international economic policies.

As with any piece of research, this article has limitations that point to future directions of research. While it focuses on comment letters as an integral component of the IPSASB's standard-setting process, it does not examine how the board's staff re-elaborate and make use of the comment letters submitted. Future research may attempt to better capture the extent to which suggestions made through comment letters are accepted and influence the final standards, as well as under what conditions and with which differences among stakeholders. Such an analysis will reveal whether and to what extent comments proposed by countries with more experience in accrual accounting are taken into consideration and, thus, will investigate how the context may affect the legitimization process.

ACKNOWLEDGMENTS

Open Access Funding provided by Università degli Studi di Salerno within the CRUI-CARE Agreement.

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NOTES

¹ These last two cases were included in the same category, as IPSAS are considered to be close to IFRS, as observed in Section 2.

² Obviously, to address RQ2, letters submitted by international organisations were not considered.

³ The results are not tabulated here, but they are available upon request.

⁴ International Research Society for Public Management—Public Service Accounting & Accountability Group.

⁵ Comparative International Governmental Accounting Research Network.

⁶ European Groups for Public Administration—Permanent Study Group XII (Public Sector Financial Management).

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How to cite this article: Bisogno, M., Manes-Rossi, F., & Sicilia, M. (2022). Designing international public sector accounting standards: An analysis of constituents' participation through comment letters. *Financial Accountability & Management*, 1–25. <https://doi.org/10.1111/faam.12343>

APPENDIX 1

LIST OF RESPONDENTS

	H	M	R	70	71	72	Total
GOVERNMENTAL ORGANIZATIONS							
Korea Institute of Public Finance (Korea, Republic of)	X	X	X	X	X	X	6
French Directorate of Public Finances (DGFIP) (France)	X		X				2
Treasury Board of Canada Secretariat (Canada)	X	X		X	X	X	5
Amafa AkwaZulu Natali (South Africa)	X						1
Agency for Modernisation Ministry of Finance (Denmark)	X						1
Austrian Ministry of Finance	X						1
Italian Ministry of Economy and Finance	X						1
NZ On Air—Broadcasting Commission (New Zealand)			X			X	2
Heads of Treasuries Accounting and Reporting Advisory Committee (Australia)	X	X	X				3
NZ Film Commission			X			X	2
Austrian MoF			X				1
Tiago Melo (Portugal)				X	X	X	3
Ministry of Finance, Province of British Columbia (Canada)		X					1
National Board of Accountants and Auditors—Tanzania		X			X		2
TMP Maori			X				1
Auckland Council (New Zealand)					X		1
Office of the Auditor General of Alberta					X		1
AuditNZ			X				1
Accrual Accounting Center				X	X	X	3
NSW Treasury (Australia)				X	X	X	3
ACAG Australia			X				1
US GAO			X	X	X	X	4
Secretaria de hacienda y credito publico—Mexico				X	X		2

(Continues)

	H	M	R	70	71	72	Total
Conselho Federal de Contabilidade (Brazil)					X	X	2
Office of the Comptroller General, British Columbia (Canada)				X	X	X	3
Financial Reporting Council of Nigeria (Nigeria)				X	X	X	3
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Brazil	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Chile	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Colombia	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Costa Rica				X	X	X	3
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Ecuador	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—El Salvador				X	X	X	3
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Guatemala				X	X	X	3
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Honduras				X	X	X	3
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Panama	X						1
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Paraguay	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Peru	X			X	X	X	4
Foro de Contadurías Gubernamentales de América Latina (FOCAL)—Mexico	X			X	X	X	4
New Zealand Treasury (New Zealand)				X	X	X	3
Auckland Council (New Zealand)				X		X	2
PROFESSIONAL ASSOCIATIONS							
Institute of Chartered Accountants Ghana (Ghana)	X			X	X	X	4
Chartered Accountants Australia and New Zealand (CA ANZ) (New Zealand)	X	X	X				3
The Institute of Certified Public Accountants in Ireland (Ireland)	X						1
CPA Australia (Australia)	X						1
Institute and Chartered Accountant of India (India)	X		X				2
The Japanese Institute of Certified Public Accountants (Japan)	X	X	X	X	X	X	6
CIPFA (United Kingdom)	X	X	X	X	X	X	6
ICAEW (United Kingdom)	X	X	X	X	X	X	6
Accountancy Europe	X	X	X	X	X	X	6
Australasian Council of Auditors-General	X						1
Malaysian Institute of Accountants (MIA) (Malaysia)	X	X	X	X	X	X	6
Association of National Accountants of Nigeria—ANAN (Nigeria)	X						1
The Pan African Federation of Accountants (PAFA)		X		X	X	X	4
ACCA		X		X	X	X	4

(Continues)

	H	M	R	70	71	72	Total
Institute of Chartered Accountants of Zimbabwe		X					1
Institute of Chartered Accountants of Nigeria (Nigeria)			X	X	X	X	4
CPA Australia and Chartered Accountants Australia and New Zealand				X	X	X	3
Institute of Certified Public Accountants of Rwanda (ICPAR) (Rwanda)				X			1
Botswana Institute of Chartered Accountants (Botswana)				X	X	X	3
National Board of Accountants and Auditors—Tanzania				X		X	2
Conselho Federal de Contabilidade (Brazil)				X			1
Malaysia Institute of Accountants (MIA) (Malaysia)				X	X	X	3
STANDARD SETTERS							
CNoCP (France)	X		X	X	X	X	5
Swiss Public Sector Financial Reporting Advisory Committee (Switzerland)	X	X	X	X	X	X	6
FASAB_Showalter, D. Scott (United States)	X						1
Public Sector Accounting Standards Board (Kenya)	X	X	X	X	X	X	6
New Zealand Accounting Standards Board	X	X	X	X	X	X	6
Accounting Standards Board South Africa	X	X	X	X	X	X	6
PSAB (Canada)	X	X	X	X	X	X	6
Conselho Federal de Contabilidade (CFC) (Brazil)		X	X				2
Conseil de normalisation des comptes publics (France)		X					1
Comissão de Normalização Contabilística (Portugal)				X	X	X	3
Australian Accounting Standards Board				X	X	X	3
Governmental Accounting Standards Board (United States)				X	X	X	3
INTERNATIONAL ORGANIZATIONS							
International Consortium on Government Financial Management (ICGFM)	X	X	X				3
World Bank (IBRD and IDA)	X						1
United Nations System Task Force on Accounting Standards	X						1
Unicef_NZ			X				1
European Commission		X	X	X	X	X	5
ITER Organization			X	X	X	X	4
United Nations Office for Project Services				X			1
UNDP				X	X		2
FAO—Food and Agriculture Organization of the United Nations				X		X	2
IAEA—International Atomic Energy Agency				X	X		2
IOM—International Organization on Migration				X	X	X	3
UN System				X	X	X	3
UNEP—United Nations Environment Programme				X			1
UNESCO—United Nations Educations, Scientific and Cultural Organization				X			1
UNFCCC—United Nations Framework Conventions on Climate Change				X			1
UNFPA—United Nations Population Fund				X			1

(Continues)

	H	M	R	70	71	72	Total
UN-Habitat—United Nations Human Settlement Programme				X			1
UNHCR—United Nations High Commissioner for Refugees				X			1
UNICEF—United Nations Children's Fund				X	X	X	3
United Nations Secretariat				X	X	X	3
WIPO—World Intellectual Property Organization				X	X	X	3
African Union Commission (AUC)						X	1
AUDITING/CONSULTING FIRMS							
der Wirtschaftspruefer in Deutschland e.V. (IDW) (Germany)	X		X				2
KPMG Services Proprietary Limited	X						1
Liquid Pacific	X	X					2
Valuology		X					1
EY		X	X	X	X	X	5
WSP Opus (New Zealand)		X					1
APV (Australia)		X					1
PwC			X	X	X	X	4
Kalar Consulting Ltd. UK			X	X	X	X	4
KPMG South Africa			X	X	X	X	4
Industry UK			X				1
SUPREME AUDIT INSTITUTIONS							
Jean Raar	X						1
Cour des comptes (France)	X		X				2
Office of the Auditor General of Ontario				X			1
Office of the Auditor General of Alberta (Canada)						X	1
Office of the Auditor-General (New Zealand)				X	X	X	3
Office of the Auditor General of Canada (Canada)	X				X	X	3
ACADEMICS							
Task force IRSPM A&A SIG, CIGAR Network, EGPA PSG XII	X	X	X	X	X	X	6
Michel Maher, Avocat, CPA, LLM, LLD (Canada)				X			1
INTERESTED groups							
Council of Australasian Museum Directors (CAMD) (Australia, New Zealand)	X						1
OTHER							
Halimeh Rahmani (Iran (Islamic Republic of))		X					1
Ricky Perry (United States)	X						1
John Milne (New Zealand)		X					1
David Hardidge (Australia)		X		X	X	X	4
NZ Health board			X				1
Vincenzo Cordaro (Italy)				X	X		2
Donald Love (United States)					X		1