WORKING PAPER

VARIATIONS IN NATIONAL MANAGEMENT ACCOUNTING APPROACHES

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Abstract

During the 1990's studies of management accounting practices in Europe and in Latin America have given us data on 23 countries. In this paper we use this data to identify five distinct aspects of national management accounting culture being:

1. The influence of regulations on official recommendations;
2. The source of management accountants;
3. Influence from one country to another;
4. Variations in use of specific techniques;
5. Variations in the objectives of the management accounting system.

We then identify seven significant implications of the manager operating in the multinational environment.

Key words: national management accounting, Europe, Latin America

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VARIATIONS IN NATIONAL MANAGEMENT ACCOUNTING APPROACHES

1. Introduction

Two recent books comparing national management accounting environments, one on Europe (Bhimani, 1996) and the other on Latin America (Lizcano, 1996) have highlighted how national approaches vary in this area. In this article we:

1. Contrast this recent awareness of contrasts in national management accounting approaches with the well established awareness of contrasts in national financial accounting approaches.
2. Discuss the ways in which national management accounting environments vary drawing mainly, but not exclusively, on the work of Bhimani on Europe and Lizcano on Latin America.
3. Reflect on the implications of these variations for managers working in an international environment.

2. Comparative national management accounting

An analysis of national variations in financial accounting practice emerged as early as 1911 in a lecture by Henry Rand Hatfield (reprinted as Hatfield 1966). Comprehensive international surveys of national financial reporting practice emerge from the 1970's onwards. (See for example Price Waterhouse 1973, 1975, 1979"). By contrast the first comparative published surveys of national management accounting practices only emerge at the regional level, and as recently as 1996, in surveys of Europe by Bhimani (1996) and of Latin America by Lizcano (1996).

Both surveys have involved giving experts on management accounting within the country concerned an outline of areas to be covered and allowing them to describe the management accounting environment in their country in their own way. Bhimani covers Belgium, Denmark, Finland, France, Germany, Greece, Italy, the Netherlands, Spain, Sweden, and the United Kingdom. Lizcano covers Argentina, Brazil, Columbia, Cuba, Chile, Ecuador, El Salvador, Guatemala, Mexico, Paraguay, and Peru, together with Spain and Portugal. Altogether, therefore, we have studies of 12 European and 11 Latin American countries, with Spain covered twice. In a review of Bhimani, Birkett (1998) observes that the very concept of what constitutes the domain of management accounting varies between the countries covered. In this paper, we put forward five distinct aspects of national management accounting culture where we believe comparisons between countries can be made:

1. The influence of regulations or official recommendations on management accounting practice.
2. The training and qualifications of a management accounting profession.
3. The impact of one country's influence on another.
4. Variations between countries in the use of specific management accounting techniques.
5. The objectives of using management accounting techniques.

3. Regulations and official recommendations

In Bhimani we find reference to three countries, France, Greece and Spain, where the government accounting 'plan' that regulates financial accounting reports also includes a section relating to cost or management accounting.

In France, a voluntary management accounting section was added to the 'plan' in 1982.

In Greece, the Helenic General Accounting Plan, first issued in 1981, was expanded to include a management accounting system in 1987. Since 1991, this system has been compulsory for all companies exceeding stipulated size criteria. A survey by the Institute of Financial Management of the Hellenic Management Association conducted in 1993, found that some 40% of managers considered these provisions unsatisfactory; no common grounds for this view emerged from the survey.

In Spain, the first General Accounting Plan (PGC) was published in 1973, with a cost accounting section being added in 1978. Use of this was voluntary. In 1990, a new PGC, incorporating the requirement of the EU 4th and 7th Directives, was published. This did not include a section on cost accounting, but the statement of 1978 has never been officially withdrawn. A survey reported in Bhimani observed that 24% of companies were still using the cost accounting system of the old PGC but that "this percentage is quickly diminishing" (P191).

Lizcano reports that in Portugal the first General Accounting Plan of 1977 did not include a section on cost accounting, it being envisaged at the time that cost accounting plans for individual industry sectors would be produced later. In fact these have never materialised.

Lizcano identifies three Latin American countries, Cuba, Guatemala and Peru, where there is a detailed chart of cost accounts in the 'accounting plan'.

The concept of a government led system of regulation or recommendation for management accounting falls firmly into a 'Continental European' accounting tradition. However, a government led programme to provide guidance on cost accounting for specific purposes can also be found in the Anglo-American tradition. To give two examples:

1. In the USA, a Cost Accounting Standards Board (CASB) was established in 1970. The reason was that, during the Vietnam war, Congress was concerned at variances and inconsistencies in defence contractors cost accounting practices.

As Enthoven (1973) explains:

"The aim of this unification of cost accounting standards is to achieve comparability, reliability and consistency of cost data for contract purposes, while maintaining equity and adherence to sound accounting principles" (p. 130).

By 1980, Congress felt that a comprehensive set of cost accounting standard was in place and discontinued the board's work. In 1990, however, the CASB was revived to deal with a range of new accounting issues that had arisen (Hubbard 1990).

2. In India, legislation in 1964 required companies engaged in mining, processing or manufacturing activities to maintain records for the purpose of a cost audit. The objectives were considerably wider than those of the CASB in the US. The Indian government could require a cost audit in four situations:

   a) For companies undertaking government contracts paid on a cost + percentage of profit basis.
   b) Where tariff protection is required.
   c) For price controls for certain commodities.
   d) To respond to profiteering by monopolies or inefficiency in major companies. (see Jaggi 1970).

4. The management accounting profession

Of the twenty three countries covered by Bhimani and Lizcano only one, the United Kingdom, has a professional body devoted specifically to management accounting. This is the Chartered Institute of Management Accountants (CIMA).

In the absence of a specific professional body for management accountants the role can be filled, at least partially, in four ways:

1. Trained public auditors and accountants may move into a management accounting role. Hantrais (1995) notes a contrast between the Institute of Chartered Accountants in England and Wales (ICAEW) and the equivalent French body, Ordre des Experts Comptables et Comptables Agréés (OECCA) in this respect.

   In the UK members of the ICAEW who move into commerce or industry continue to be members of their professional body. Thus, the ICAEW acts in the two roles of overseeing the training of many future management accountants and of serving as their professional body. In France, by contrast, members of OECCA who move out of public practice cease to be members; thus OECCA acts as a training overseer, but not as a professional body for management accountants. Outside the UK and Republic of Ireland, most European counties would follow the French model although in a number, such as Germany, the move from public practice would in any case be rare.

2. Voluntary bodies may emerge to promote discussion of accounting issues. Notable examples are:
   a) The Spanish Association for Accounting and Business Administration, (Asociacion Española de Contabilidad y Administracion de Empresas - AECA), founded in 1979. This voluntary association of those with an interest in accounting has some 4,000 individual, and 500 corporate, members. Since 1989, the Management Accounting Principles Committee of AECA has issued recommendations on management accounting. A survey conducted by a research team from the University of Valencia found 88% of management accountants making some use of these recommendations (Montesinos 1994).

b) In Argentina the Ministry for the Economy has commissioned the Instituto Argentino de Profesores Universitarios de Costes (IAPUCO) - the Argentine Institute of University Teachers of Costing - to provide a recommendation on best practice in cost accounting.

3. Engineers may become involved in management accounting issues. In France there is a tradition of engineers occupying leadership positions in business; some 50% of chief executive officers of French companies are engineers by training. Alongside the detailed costing provisions in the accounting tradition of the accounting plan there has emerged, under the influence of engineers, the concept of the 'Tableau de Bord', literally an instrument panel, presenting key physical and financial indicators.

4. Universities and consulting firms can be important channels for the circulation of management accounting ideas. Thus in Belgium:

   "Dissemination of information on new trends in management accounting has taken place mainly through universities, business schools, and consulting firms". (Bhimani 1996, p. 2).

In family run businesses a problem can arise as to the amount of authority entrusted to the management accountant.

On the one hand such firms may be reluctant to entrust professional managers with the authority to implement advanced management accounting techniques. On the other hand family members themselves may take an interest. Thus in Italy:

"In many family run businesses second-generation managers with a college basis education and a greater understanding of the potential of new sophisticated management tools are progressively taking over company responsibilities" (Bhimani 1996, p. 159).

The authors have observed a similar situation in Spain.

5. Other country´s influence

For eight of the eleven countries covered by Bhimani, together with Portugal as covered by Lizcano, there is some report of foreign influence on national accounting practice. This is summarised in table 1. A number of points emerge from this analysis:

1. A pattern of regional links, within Scandinavia and from the Netherlands to Belgium, appears.
2. The two most influential counties appear to be Germany, mainly in the first half of the 20th century, and the USA, mainly in the second half of the 20th century.
3. The English language influence appears to come mainly from the USA rather than the UK, despite the UK's proximity and European Union membership. However, Spain may be a leader in making a change:

   "Over the past few years, British researchers have made an impact on management accounting in Spain. This has also been the case at the teaching level (especially Colin Drury's textbooks)" (Bhimani 1996, p. 189).

Of particular interest are the three countries where no particular foreign influence is mentioned. For two of these the reason may well be the strength of the domestic accounting tradition, being Germany and the UK. For Greece, by contrast, the lack of foreign influence seems attributable to a basic lack of interest, until recently, in management accounting.

Table 1. Perceived 'other country' influences

Page Reference	Influencing Country	Influenced Country	Date / Period of Influence
Bhimani			
1	Netherlands	Belgium	1950's / 1960's
2	US / UK	Belgium	1970's / 1980's
32	Sweden	Denmark	Post 1937
33	USA	Denmark	1949 / 50
55	Germany	Finland	1928 onwards
58	Denmark	Finland	1950's
77	USA	France	1960's
149	USA	Italy	1970's
166	Germany	Netherlands	1920's
188	Germany	Spain	Until 1970's
189	France	Spain	Since 1978
189	USA	Spain	Second half of 1980's
189	UK	Spain	1990's
200	Germany	Sweden	1920's
Lizcano			
298	USA	Portugal	1960's onwards

For six of the Latin American countries in Lizcano (1996) we have an analysis of the national origin of the more influential management textbooks used in their country.

Table 2 summarises this data. In the case of most US texts it is generally observed that these are read in Spanish language translations, generally published in Mexico. Spain is the only European country referred to and the only reported influence from the English speaking world comes from North America. Mexico emerges strongly as the leading influence within Latin-America, as well as being a conduit for ideas from the USA.

Table 2. Influential publications from other countries

Country Influenced	**Nationality of publication**						
	USA	**Canada**	**Spain**	**Mexico**	**Venezuela**	**Columbia**	**Argentina**
Argentina	√						
Cuba	√	√	√	√	√		
Chile	√			√		√	√
Ecuador	√		√	√			√
El Salvador	√			√			
Guatemala	√			√		√	

6. Specific management accounting practices

The approach taken to describing national management accounting practices varies both between Bhimani and Lizcano, and between national contributors within each book. This is understandable, given differences in the national issues arising and the availability of survey evidence.

Turning first to Bhimani's analysis of eleven European countries, three areas stand out:

1. The relative use of full and variable costing. Bhimani offers extensive discussion of this issue for eight of the countries covered in the text.

2. Evidence of the use of Activity Based Costing (ABC). Bhimani's contributors tend to perceive this as a test of the extent of interest in 'modern' accounting methods in their countries, and the topic is considered for all eleven countries.
3. The use of current cost accounting, a distinctive feature of the Netherlands.

Table 3 summarises the data on the relative use of full and variable costing in eight countries. In only two countries, Denmark and Finland, variable costing is the majority practice. In Italy and Spain variable costing has a strong presence. In Sweden, France, Germany and Greece there seems to be a strong majority following full costing.

Table 3. Summary of quantitative and qualitative data on full versus variable costing

	Qualitative	Quantitative
Denmark	Up until 1952 the imposition of price controls forced the use of full costing. From 1951 onwards opinion moves in favour of marginal costing.	Some 40% of companies now use full costing. This is a drop from some 50% in the 1970's.
Finland	Cost based pricing rules in the 1940's forced full costing. Opinion moves towards variable costing in 1950's.	Variable costing 41.5% Full costing 30.8% Variable / Full misc 26.9% Other 0.8% 100 %
Sweden	Tradition of full costing. From 1949, growing argument for marginal costing. Concensus is a compromise.	Full costing 57.9% Variable 9.9% Variable / Full misc 32.2% 100 %
France	Full costing 'strongly challenged' by variable costing in late 1960's, 'but the current management mentality still favours full costing' (p. 77).	
Germany	'Practice of German enterprises is dominated by thinking in terms of full costing' (p. 104).	Order of use: 1. Actual cost using full costs. 2. Standard cost using full costs. 3. Standard cost using full and marginal costs. 4. Contribution margin accounting.
Greece	Plan provides for full cost.	
Italy	In 1970's literature moved in favour of variable cost.	Survey showed: 33% variable 38% full cost.
Spain	During second half of 1980's move from Continental European to North American perspectives.	Full costing 49% Variable costing 26% Other 25% 100%

Table 4 shows survey evidence of the extent of ABC adoption for seven countries. Differences in types of companies surveyed, sample sizes, and industry coverage necessarily limit the comparability of these surveys. However, the particular strength of ABC in the UK and Belgium, and weakness in Denmark and Germany is notable. Survey evidence from Finland suggests particular strength of ABC in the metal and engineering industries.

Table 4. Survey evidence of ABC adoption

	% with some use of ABC in operation	**% planning to use or considering ABC**	**Year of survey**	**Number of companies in sample**
Belgium	19.5	49.5	1994	88
Denmark	0	6.0	1994	118
France	33.0*	N/A	1994	70
Finland	11.0**	13.0	1993	183
Germany	3.2	N/A	1994	199
Greece	17.4	N/A	1994	23
UK	19.5	27.1	1994	251

* Only 38% of these considered ABC as their main system.

** Higher usage reported in a survey of the metal and engineering industries.

Note:

Where several surveys for a country are reported, we select:

a) That with the most wide range of industries.

b) The most recent.

Table 5 offers selected quotes from each country analysis relating to ABC. Some key issues emerging are:

1. In the UK, ABC is seen particularly as a cost cutting tool. This is explicitly not commonly the case in Belgium and France.

2. In Italy and Sweden there is specific mention of restricting use of ABC to pilot projects in specific areas.
3. In some countries where ABC is not common it has been introduced under the influence of foreign parent companies. (See Denmark, Greece, Spain).
4. Grounds to resist ABC are the cost of implementation (Finland and Italy) and the problem of explaining its relevance to managers (Finland and Greece).

Table 5. Qualitative Comments on ABC

Belgium	"A method to better track overheads .... Only 17% of the companies reported that they had a cost reduction motive" (pp. 14-15).
Denmark	"ABC appears to be common only among subsidiaries of foreign groups" (p. 49).
Finland	"the main problems which seemed to have inhibited a rapid, smooth implementation of ABC / ABM projects were tied to the non-availability of necessary data, the complex process of data collection, and the heavy workload involved in maintaining and updating these new systems of calculations .... As one ABC system project leader indicated .... 'it just seems to me that the prime users of product cost information, marketing personnel, are not interested in the system at all" (pp. 66-67).
France	"ABC, as it is used in France, remains essentially a strategic, motivational tool, not so much a costing tool" (p. 85).
Germany	"The limited use of activity based costing and target costing in practice contrasts with the widespread, controversial coverage which those topics attract in the business studies literature" (p. 104).
Greece	"Four firms were using, or phasing in, activity based costing .... two of the companies who introduced ABC did so at the suggestion of their (multinational) parent companies .... the finance manager .... of one of these companies .... actually said that the biggest problem in implementing ABC was educating senior managers and trying to gain their support" (p. 132).

Italy	"ABC is often seen as a burden to administrators, because of the costs of running such a system, and as being inflexible in relation to the continuous changes arising from a dynamic business environment .... Often, ABC's solutions are limited to specific management areas or are directed towards the solution of specific problems" (p. 159).
Netherlands	"Recent publications and discussions relating to ABC have renewed Dutch academic and practitioners' interest in the original German and Dutch theorising about cost allocation" (pp. 172-173).
Spain	"Very few companies are using ABC, and where they are, it is purely on a pilot basis. The factors influencing ABC experimentation are mainly professionals training with foreign parent companies. There is also some influence from large audit and consulting companies" (p. 192).
Sweden	"There is little evidence in this survey that ABC or other 'new' techniques have been adopted by companies .... About one-fourth stated that they are planning to adopt or, at least, are willing to try ABC on a pilot scale" (p. 211).
United Kingdom	"The cost reduction and cost control attractions of ABC have proved to be particularly popular" (p. 227).

For just one country, the Netherlands, the analysis offered in Bhimani has one strikingly distinct feature. This is a discussion of the use of current values in Dutch management accounts. Table 6 shows the results of two surveys, one in 1984 and one in 1994, on the use of current values in product costing. Although use of current values in cost accounting appears to be in decline, it is still substantial.

Table 6. Surveys on the use of current values in product costing in the Netherlands

	1984 (%)	1994 (%)
Historic cost	17	47
Current value	54	36
Other	29	17
	100	100

Turning to Latin America, Lizcano only finds a systematic survey of management accounting practice in one country, Mexico. Here just 6% of companies implemented ABC.

Anecdotal evidence on other countries is:

1. In Argentina the economic reforms of 1991 forced business to be more competitive and so gave a boost to cost and management accounting. Even in the public sector, where traditionally there has been little attention paid to cost analysis, more interest in now being shown. Most larger, and some smaller, businesses have embarked on programmes with Total Quality Management (TQM). There has been some experimentation with ABC.
2. In Brazil the overwhelming constraint on accounting has been inflation. Very few companies run comprehensive costing systems. Historically, costing systems have developed more in unregulated industries with no cartels, such as textiles.
3. In Cuba there is a national cost accounting plan, but it is not uncommon for managers to be negligent in its application. There has been some use of TQM, particularly in pharmaceuticals and bio technology. ABC and JIT have been discussed but not yet implemented.
4. In Chile comprehensive costing systems are found mainly in the larger businesses. There is a shortage of software to support good costing systems. There has been a little experimentation with ABC and environmental accounting.
5. In Ecuador comprehensive cost accounting systems are found mainly in larger companies. There has been a little experimentation with ABC.
6. In El Salvador comprehensive costing systems are found mainly in large industrial companies. There has been a little experimentation with TQM and ABC.
7. In Guatemala comprehensive costing systems are found mainly in large companies.
8. In Paraguay comprehensive costing systems are found only in the handful of large companies; even here, it is common for many features of bought in software to go unused.

9. In Peru costing records normally follow the national accounting plan, based on the French model. In large enterprises frequent revision of budgets is common because of inflation.

7. Objectives of Management Accounting

Enthoven (1982) argues:

"The exploration and layout of an (international) management accounting conceptual framework require urgent attention by academicians .... This framework is to be based on society's changing objectives or aims. The objectives underlying the framework may well diverge - by country - as to primary and secondary objectives" (p. 73).

In both Bhimani and Lizcano, we find that contributors do not explicitly consider what the objectives of a management accounting system is in their country. However, a comparison of national management accounting cultures highlights variations in objectives. We consider these under seven headings:

1. **Compliance**. As we have seen above, some countries have explicit national cost accounting regulations or requirements. Compliance with tax rules or price controls can also have an impact on management accounting. To give three examples:

   a) In Finland tax law requires stock valuation to be on a variable costing basis. This has been influential in promoting variable costing in the management accounts.

   b) In Italy a national propensity for tax evasion has given rise to a distrust, particularly in small firms, for keeping costing records which the authorities might use to identify concealed profits:

   "many small firms prefer to underrepresent income and attempt to reduce tax liabilities by book-keeping adjustment. Such practices need to be hidden from government agencies, of course, so, as a consequence, a management accounting system cannot record actual financial flows .... many small companies prefer to avoid taxation charges through 'black' business activities rather than achieve a higher degree of potential efficiency by adopting management accounting tools requiring and producing accurate, relevant data" (Bhimani 1996, p. 153).

c) In Germany in the 1930's, and in Denmark and Finland in the 1940's, the use of costing records for government price setting led to the general use of full costing at that time.

2. **Bonus Schemes**. Both the extent to which management accounting information is employed and the ways in which it is used, for salary and bonus decisions, vary between countries.

Bailes and Assada (1991) report on a questionnaire survey of Japanese and US chief financial officers on their use of budget systems. Points of difference emerging include:

a) There is a wide gap between Japan and the US in the extent to which divisional budgets affect bonus and salary levels.
b) In the evaluation of divisional managers, US firms attract more importance to profit than sales growth. In Japan sales growth is more important.
c) In general terms, US companies attach more importance to budget performance in evaluating divisional managers than Japanese companies.

3. **Ideology**. Bromwich and Wang (1991), discussing the spread of western management accounting techniques in China, observe:

"somewhat surprisingly from a western perspective, the philosophical view in China required theoretical and political justification of these techniques before they could be applied" (p. 53).

Similarly, Lin & Deng (1992) observe:

"The nature of accounting is defined as something that is intrinsically ideological" (p. 173).

4. **Competition**. The growth of competition gives rise to an objective of more effective management accounting.

Amat et al (1994) see the end of the system of protection that had shielded Spanish industry from international competition until the mid 1970's as a major force for the development of management accounting systems in Spain thereafter. In Argentina the removal of tariff barriers with the country's 'Mercosur' partners (Brazil, Paraguay, and Uruguay) has been seen as stimulating competition and consequently increasing the demand for strong cost management. In Brazil, it has been noted that the industries that have led the way in developing innovative approaches to costing have been those which do not enjoy protection, starting with the textile industry in the 1950's.

The competitive pressures of a global economy are cited in Bhimani to explain growing interest in advanced management accounting techniques in both Germany and Italy.

5. **The advocacy role**. In some countries there is a stronger tendency than in others for budgets to be manipulated to support a manager's desired case.

   Johnson and Byington (1993) report on a survey of senior managers in the USA and Spain. Questions on the activities and attitudes of the managers suggested a similar level of competence and experience in the two countries, although Spanish managers were more likely to express a desire for a stronger background in the technical aspects of budgeting.

   Ten questions were put to those managers on tactics they employed when presenting budgets. In every case the Spanish managers appeared more inclined to use manipulative tactics when formulating budgets than US managers.

   These findings are highly significant for the manager in the multinational company. For example, a manager in a US holding company might take too literally the Machievellian budget presentation of the manager of a Spanish subsidiary; conversely, the manager of a Spanish holding company might over compensate for anticipated manipulation in the budget submissions of a US subsidiary.

6. **Operational involvement**. The contrast in the role of the management accountant in the UK and Germany has been highlighted in the study of accounting in the brewing industry by Ahrens (1997). He contrasts the view management accountants have of their role:

"The British complained that the Germans were too distanced from operational action".

and conversely:

"The Germans felt that their British colleagues meddled too much in operation matters" (Ahrens 1997, pp. 583-584).

7. **Attitudes to labour cost**. We have seen, in reviewing European approaches to activity based costing as discussed in Bhimani, a difference between a cost cutting role in the UK and an explicit rejection of that role in France and Belgium.

   A similar contrast between 'Anglo Saxon' and 'Continental European' attitudes emerges in comparing a US case where 'assigning costs where they belonged, goaded managers to change work flows, eliminating the need for two of seven fork lift trucks and their drivers' (Rao, 1997), with a Spanish wine company we researched. This wine company implemented ABC subject to a strict no redundancy rule. Thus when three out of six staff in one marketing section were found to be surplus, they were moved to other marketing functions.

8. Conclusion

For the manager operating in the international context the variations in national approaches to management accounting have a range of significant implications:

1. Apparently straightforward terms tend to be defined differently in different countries. We have observed that even the term 'management accounting' implies different meanings across national boundaries.
2. In different countries the background, training, and professional organisation of management accountants varies. In particular:
   a) the type of professional body management accountants belong to impacts on the ethical code, if any, which they work to.
   b) the facilities available to the management accountant for updating their skills varies between countries.
3. Bonus schemes drawing on detailed accounting allocations to define management achievements do not transfer comfortably across national boundaries.

4. The impact of regulatory constraints on management accounting techniques also varies across countries.
5. Both as a provider and as a recipient of accounting reports across national boundaries, the manager needs to be aware of the degree of manipulation in management accounting reports that is either acceptable or common in different countries.
6. The manager needs to be aware that there are variations in the way that management accounting information will be used in different countries.
7. On a positive note, a manager can achieve a competitive advantage by applying an innovative management accounting technique learnt from one country in another country where the implications have not yet been absorbed.

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