

Enhancing Professional Accounting Education: Concept-Mapping Learning Theories to Proficiency Levels

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Abstract

This study mapped Bloom's taxonomy and Vygotsky's zone of proximal development (ZPD) to the South African Institute of Chartered Accountants' (SAICA) tax technical proficiency levels, offering a novel instructional framework to clarify proficiency levels and support curriculum design in professional accounting education. Despite the prominence of proficiency levels in SAICA's competency framework, ambiguity persists among lecturers and students regarding the expectations and application, risking syllabus overload and misaligned teaching strategies. Adopting a qualitative approach, the study employed concept mapping to integrate learning theories with tax technical competencies. The findings show that Bloom's taxonomy provides valuable insight for distinguishing between levels 2 and 3, most notably highlighting the difference between analysing and evaluating. Vygotsky's learning theory, in turn, clarifies the foundational Level 1 as risk recognition, achieved through a sound grasp of principles and the ability to ask appropriate questions. These insights provide lecturers with clearer guidance for teaching and assessment and assist students in understanding the scope and limits of their competencies. To the best of the author's knowledge, this is the first study to apply concept mapping to proficiency levels, contributing a novel interpretive framework that serves as a practical interpretive tool for lecturers and students, with potential applicability across other disciplines in professional accounting education.

Keywords: proficiency levels, professional accounting education, tax technical competencies, concept mapping, learning theories.

1. Introduction

We live and work in a "*VUCA world – volatile, uncertain, complex and ambiguous*" (SAICA, 2025a, Competency framework section). Recognising the pace of exponential and continuous change, the South African Institute of Chartered Accountants (SAICA) has prioritised the continued relevance of accountants in their professional roles. In response to evolving demands, SAICA issued its first competency framework in 2009 (Streng, 2011), followed by the CA2025 project launched in 2017 to revamp the framework (SAICA, 2017; Stumke, 2021). The updated competency framework was

released on 10 March 2021 after extensive research and consultation (Accountancy SA, 2021), with further updates in October 2023 and February 2025 (SAICA, 2023a, 2025b). The CA2025 project has since been rebranded as the “CA of the Future” initiative (SAICA, 2025a, CA of the Future section). The competency framework articulates the professional competencies expected of a Chartered Accountant (South Africa) [CA(SA)] at entry into the profession.

The competency framework underpins the qualification process – education, practical work experience, and professional assessments – required to attain the CA(SA) designation. Its principal components are professional values and attitudes, enabling acumens, and technical competencies (Figure 1). This study focused on the education component, with particular attention to tax technical proficiency levels, given that technical competencies drive all acumens and outcomes (see the purple “technical competencies” icon at the centre of Figure 1).

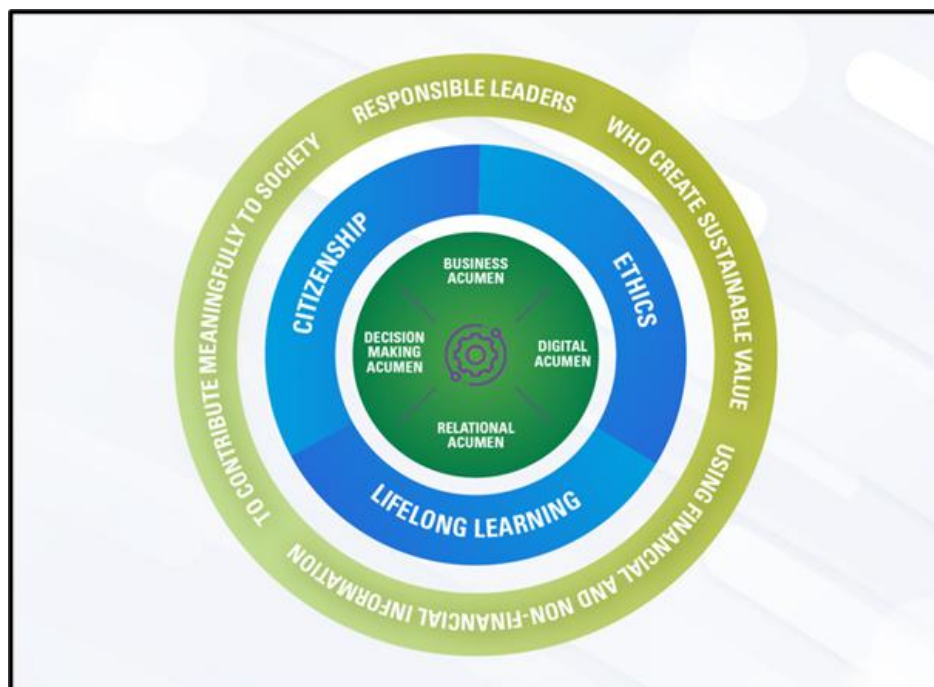


Figure 1: SAICA's depiction of competencies (SAICA, 2025b, p. 6)

Although the competency framework defines three technical proficiency levels – Foundational (Level 1), Intermediate (Level 2), and Advanced (Level 3) – persistent ambiguity surrounds their interpretation and application in professional accounting education. The following four extracts from universities' feedback on the competency framework (SAICA, 2023b) highlight recurring challenges:

"It is not clear to what extent application is expected on Level 1."

"It seems as if a deep conceptual knowledge and understanding of the principle will be required if it is at Level 1. This is different to our interpretation of awareness in the past."

"To address the cognitive overload, many 'core' topics have been assigned Level 2 as a proficiency level. However, from a lecturing perspective, it will be very difficult to distinguish between proficiency levels 2 and 3. The effect will be that Level 2 topics will most likely be lectured as Level 3 topics (with no overload reduction). More clarity is needed on exactly what is expected on levels 2 and 3."

"Due to some lack of clarity, there is a risk that the interpretation of the level descriptor might result in adding to the syllabus instead of reducing the workload."

These concerns point to four issues: ambiguous expectations, inconsistent interpretation of proficiency levels, difficulty distinguishing levels in practice, and an unintended risk of increasing (rather than reducing) curriculum load. Accordingly, this study examined how learning theories can clarify the interpretation of the three tax technical proficiency levels.

The remainder of this paper presents the literature review, research approach adopted, and the concept mapping of tax technical proficiency levels, followed by a discussion of their broader applicability across other disciplines in professional accounting education. The paper concludes with key insights.

2. Literature Review

The use of learning theories is widely recognised as essential for effective teaching and instructional design in higher education (Ambrose et al., 2010; Khalil & Elkhider, 2016; Klein & Kelly, 2018; Nworie, 2022; Ritzhaupt & Kumar, 2015; Schubert, 2019; Silva, 2018). The preface to the SAICA competency framework explicitly refers to Bloom's taxonomy for the cognitive domain (SAICA, 2021). Bloom's taxonomy, originally developed by Bloom et al. (1956) and later revised by Anderson and Krathwohl (2001), remains one of the most widely recognised and foundational frameworks in educational design. The revised version introduced six levels, ranging from lower-order to higher-order thinking skills, and remains widely used in curriculum design, assessment, and instruction. This aligns with prior research that applies Bloom's taxonomy as a scaffolding framework to guide the integration of competencies across levels within the accounting curriculum (Stumke, 2021, 2023).

Despite its influence, Bloom's taxonomy has drawn criticism, with some scholars arguing that it is not a learning theory but rather a classification tool for assessment (Flannery, 2019). Nevertheless, several educational texts continue to categorise Bloom's taxonomy as a learning theory (May-Varas et al., 2023; Zhou & Brown, 2017). Broader criticisms highlight its rigid hierarchy, weak grounding in cognitive science, and lack of alignment with constructivist principles. Scholars have also argued that it oversimplifies learning as a linear progression, undervalues recall, and misaligns with authentic, performance-based learning (Soozandehfar & Adeli, 2016). These concerns are reinforced by Larsen et al. (2022) and Newton et al. (2020), who pointed to structural limitations and inconsistent application. Despite these critiques, the explicit reference to Bloom's taxonomy in the competency framework indicates that SAICA has adopted it as a classification framework to guide lecturers in structuring

outcomes, assessments, and instructional activities. However, according to Khan (2012), reliance on a single framework is insufficient, as effective instructional design should integrate multiple learning theories.

Khan (2012) also contended that concept mapping offers a valuable tool for visualising and differentiating between theories, thereby enabling more targeted instructional design. Concept maps provide visual representations of relationships and hierarchies, supporting deeper understanding (Burgess & Yaoyuneyong, 2012). Their value in professional accounting education is well established, particularly in enhancing conceptual understanding and linking theory to practice (Giorgino et al., 2023; Phillips et al., 2012), with Leaby and Brazina (1998) advocating for their use as an instructional strategy. Grounded in Ausubel's theory of meaningful learning (Katagall et al., 2015), concept mapping reflects a constructivist stance, thereby directly addressing the earlier-noted critique that Bloom's taxonomy lacks alignment with constructivist principles (Burgess & Yaoyuneyong, 2012; Soozandehfar & Adeli, 2016).

These considerations motivated the study's main research question: To what extent can learning theories be mapped through concept mapping onto SAICA's tax technical proficiency levels, thereby providing a clearer basis for interpretation and enhancing professional accounting education? To address this question, three sub-questions were formulated:

1. What does the existing literature reveal about SAICA's competency framework?
2. How are proficiency levels interpreted and applied in professional accounting education?
3. How is concept mapping used to link learning theories with competency frameworks?

The three sub-questions provided a structured pathway for addressing the main research question. This created a clear logical progression: Sub-question 1 established the foundation, Sub-question 2 defined the problem, and Sub-question 3 offered the solution pathway. The remainder of the literature review is, therefore, organised into three sections. The first examines SAICA's competency framework and its broader interpretation, the second considers how proficiency levels have been interpreted and applied in professional accounting education, and the third explores the use of concept mapping to integrate learning theories with competency frameworks.

2.1 SAICA's Competency Framework

SAICA has initiated a transition towards competency-based education, emphasising the development of professional competencies rather than preparation for examinations. Academics are therefore encouraged to move beyond "teaching to the exam" and instead cultivate competencies required for professional practice. Although drawn from medical and health education, Wong (2019) argued that competency-based learning "*promises greater accountability, flexibility and learner-centredness*" (p. 10) – a perspective equally applicable to accounting. Borgonovo et al.

(2019) similarly highlighted the importance of distinguishing between knowledge-based and competency-based education.

The aim of SAICA's competency framework is to promote integrated thinking, enabling CAs(SA) to interpret, analyse, and evaluate both financial and non-financial information to influence decision-making, collaborate effectively, and contribute to society (SAICA, 2025b). The preface situates the competency framework in the context of the International Federation of Accountants (IFAC, 2025). It incorporates IFAC's International Education Standards (IES), which conceptualise competency as the integration of technical competencies (IES 2), professional skills (IES 3), and professional values and attitudes (IES 4). These dimensions map directly onto SAICA's three competency framework components: professional values and attitudes, enabling acumens, and technical competencies. This reflects the broader definition of competency as the integration of knowledge, skills, and behaviours (Jajoo & Deshmukh, 2024).

As explained in the Introduction, technical competencies are structured into three proficiency levels – Level 1 (Foundational), Level 2 (Intermediate), and Level 3 (Advanced) – which are differentiated across the dimensions of knowledge, application, and problem-solving (SAICA, 2025b, p. 10), as shown in Table 1. This three-tier structure aligns with IFAC's internationally recognised benchmarks (SAICA, 2021).

Table 1: Proficiency levels of tax technical competencies

TECHNICAL COMPETENCIES			
	1 Foundational	2 Intermediate	3 Advanced
(i) <i>Knowledge dimension</i>	Identify and describe the key ideas/principles/fundamental concepts of the subject matter pertaining to routine and non-routine situations [Technical expertise or detailed knowledge not required].	Demonstrate a detailed and comprehensive understanding of the subject matter pertaining to routine situations.	
(ii) <i>Application dimension</i>	Identify and explain the significance and relevance of the subject matter and recognise the linkages with other subject matter(s).	• Apply the knowledge to non-complex routine situations. • Identify and utilise the relevant knowledge within and across competency area(s) in a limited manner.	• Apply the knowledge to complex routine situations. • Evaluate and synthesise the knowledge within and across competency areas (Integrative thinking is required).

TECHNICAL COMPETENCIES			
	1 Foundational	2 Intermediate	3 Advanced
(iii) <i>Problem-solving dimension</i>	Recognise issues when encountered and seek further depth/guidance.	Prepare or analyse solutions for specified problems and applying limited judgement.	Evaluate or formulate solutions for specified and implicit problems – applying a high degree of rigour and/or exercise sound judgement in making recommendations.

Source: SAICA (2025b, p. 9)

The levels are progressive: Level 2 competency requires Level 1, and Level 3 requires both Level 1 and Level 2 competencies. The distinction between levels 2 and 3 lies primarily in application and problem-solving, while the knowledge dimension is underpinned by the prescribed “Tax Knowledge List”, which specifies legislative content that CAs(SA) must be able to recognise.

It is widely acknowledged that SAICA deliberately undertook efforts to address the issue of syllabus overload for prospective CA(SA) candidates – an approach that implicitly reflects cognitive load theory. Developed by Sweller (1988) and expanded by Chandler and Sweller (1991), cognitive load theory explains how excessive information can exceed working memory, hindering learning. It distinguishes between intrinsic load (inherent complexity), extraneous load (inefficient design), and germane load (processing to build knowledge structures). Mostyn (2012) first applied cognitive load theory to professional accounting, highlighting its potential for instructional design. In taxation, the principle was operationalised through refinement of the Tax Knowledge List to include only legislation deemed practical, prevalent, and relevant (Taxation Knowledge List, n.d.). Exclusion criteria targeted content that was not prevalent, specialised, duplicative, or likely to contribute to cognitive overload. For example, specialised provisions, such as collateral agreements, were excluded, as were duplications, such as royalty-withholding tax already addressed under interest. Applied in this way, the exclusions help manage intrinsic load, enabling students to focus on core principles and allocate resources to germane processing. For instance, general anti-avoidance provisions are retained, alongside explicitly identified sections such as section 8F, while more detailed rules in foundational sections, such as sections 8C(4) to (6), are excluded. The emphasis is therefore on typical principles that form the foundation of taxation, rather than on highly complex or exceptional situations.

Against this background, the review responding to the first sub-question (What does the existing literature reveal about SAICA’s competency framework?) was conducted. To ensure a systematic approach, literature searches were conducted in Scopus and

Google Scholar using Harzing's (2025) Publish or Perish software. Initial title searches combining "SAICA" and "competency framework" yielded no results in Scopus, although three relevant dissertations were identified in Google Scholar. Expanding the search to include "competency framework" in the title with "SAICA" as a keyword similarly returned no Scopus results but produced further relevant studies in Google Scholar. A targeted search using "tax" in the title with "SAICA competency framework" as keywords identified additional tax-focused contributions. These searches provided the foundation for organising the literature into three strands: pervasive skills and professional values, technical competencies in taxation, and broader applications of competency frameworks.

2.1.1 Pervasive skills and professional values

Early studies have highlighted the challenges of embedding pervasive skills and professional values in accounting education (Strauss-Keevy, 2012; Streng, 2011; Vandiar, 2010). More recent research has explored how the competency framework informs the delivery of ethics and critical thinking, with evidence suggesting that targeted interventions strengthen professional values and analytical abilities (Mabutha, 2017; Terblanche & De Clercq, 2021). Collectively, this strand demonstrates the role of the competency framework in promoting soft skills and professional judgement, while also revealing persistent concerns about their integration into curricula.

2.1.2 Tax specific

The second strand found that nine studies have engaged directly with the SAICA competency framework. Early work examined practitioners' expectations of essential tax topics (Beling, 2008; Joubert et al., 2009) and surveyed tax educators' perceptions (Alberts, 2013). Subsequent studies considered the integration of tax ethics into the curriculum (Mabutha, 2017), graduate preparedness for tax practice (Maritz, 2014), and the role of national interventions in developing pervasive skills (Viviers et al., 2018). More recent contributions have shifted towards conceptual and future-oriented perspectives, introducing frameworks for tax literacy (Bornman & Wassermann, 2018; De Clercq, 2023) and examining digital skills in professional practice (Saley, 2023). Collectively, these studies portray taxation as both a persistent area of challenge and a field of innovation, shaped by ethical imperatives, graduate readiness, and digitalisation.

2.1.3 Broader application of competency frameworks

Early contributions focused on adapting the framework to specific contexts, such as small to medium enterprises (SMEs) (Schutte, 2013; Schutte & Lovecchio, 2014) and undergraduate accounting education (Smit & Steenkamp, 2015). Subsequent studies broadened the scope by evaluating the applicability of the IFAC competency framework in South Africa (Lovecchio, 2016) and by benchmarking financial literacy development (Madikizela, 2016). More recent work reflects the growing digitalisation of the profession, with frameworks proposed for IT integration in internal audit education (Modisane, 2019) and ICT competencies for accountancy professionals (Stumke, 2021). Together, these studies demonstrate how the competency framework

concept has been adapted to meet emerging demands, including digital competency, financial literacy, and critical thinking. No studies, however, have examined the interpretation of proficiency levels – a gap that frames the focus of the next section.

2.2 Proficiency Levels in Professional Accounting Education

This section addresses the second sub-question: How are proficiency levels interpreted and applied in professional accounting education? Systematic searches revealed no studies directly linking “proficiency levels” with “accounting education”. Two doctoral dissertations referenced proficiency levels more broadly. Kasonso (2015) employed a quantitative design to examine determinants of certified public accountants’ (CPAs) perceived proficiency in applying International Financial Reporting Standards (IFRS) in California – relevant to practice but situated in the work-experience component rather than the education component of professional formation. Fam (2018) investigated how teacher perceptions of cognitive processes influence learners’ attainment of higher proficiency in less commonly taught languages; outside accounting, it illustrates the wider educational application of proficiency constructs. Fam’s (2018) study identified one accounting reference, Mostyn (2012), which introduced cognitive load theory into accounting education and underscored instructional design implications, although it did not directly engage with proficiency levels.

Beyond these 2 dissertations, 18 additional studies mentioned proficiency levels alongside accounting education; however, none explicitly connected proficiency levels to learning theories. In sum, while proficiency has been explored in relation to IFRS application and in broader educational contexts, there is virtually no research examining the interpretation and application of proficiency levels in professional accounting education. This gap is particularly pronounced in taxation, where ongoing ambiguity in SAICA’s competency framework underscores the need for theoretical perspectives to guide interpretation.

As outlined at the start of this literature review, learning theories and concept mapping provide valuable interpretive lenses. The next section discusses the use of concept mapping to integrate learning theories with competency frameworks in professional accounting education.

2.3 Concept Mapping of Learning Theories to Competency Frameworks

Concept mapping is widely recognised as both a methodology and an instructional tool for visualising relationships between concepts and linking theory to practice (Burgess & Yaoyuneyong, 2012). Its educational value is well documented across disciplines, including accounting, where it has clarified competencies, informed instructional design, and promoted deeper learning (Giorgino et al., 2023; Leauby & Brazina, 1998; Phillips et al., 2012).

Systematic searches were undertaken to establish whether concept mapping has been used to integrate learning theories with competency frameworks. In Scopus, combined queries for “concept mapping”, “learning theories”, and “competency

framework” returned no results, even after varying terms (e.g., substituting “mapping” or omitting “concept mapping”). A Google Scholar search produced one relevant study, that of Jajoo and Deshmukh (2024), which drew on psychological and learning theories to develop a cognitive competency development model in corporate learning environments. While conceptually relevant, this work aligns more with the work-experience component – emphasising structured workplace interventions – than with the education component central to this study. A broader Google Scholar search with the same keywords yielded 66 results, but manual screening confirmed that none were directly relevant.

In sum, concept mapping is well established as an educational tool, yet no studies were identified that connect learning theories to competency frameworks in professional accounting education. This gap frames the novel contribution of the present study: a conceptual mapping of learning theories to SAICA’s tax technical proficiency levels to guide interpretation for lecturers and students. The next section outlines the research approach adopted to address this gap.

3. Research Approach

This study adopted an author-driven conceptual qualitative research approach, in which concept mapping was used as an interpretive and analytical tool rather than as a participant-based data collection method. No external participants were involved. Instead, the researcher engaged in a systematic review and synthesis of relevant learning theories to conceptually map their alignment with SAICA’s tax technical proficiency levels.

Concept mapping was selected as the methodological approach due to its ability to visually represent relationships between concepts and support integrative thinking. As outlined by Bender et al. (2019), concept maps are structured visual representations that illustrate relationships between concepts, typically organised hierarchically to reflect relative importance and contextual application (Novak & Cañas, 2008). They are developed in response to a guiding focus question, which frames the scope of inquiry and ensures alignment with the research context. Cross-links between domains of the map are a distinctive feature, enabling integrative thinking and revealing relationships that are not immediately apparent in linear structures. These links often capture novel insights generated by the knowledge creator. Concrete examples may also be incorporated to clarify abstract concepts. Collectively, these features position concept mapping as a powerful methodology for organising, structuring, and generating knowledge.

Concept mapping has been recognised for its educational value, particularly in supporting teaching and learning (Liu & Wang, 2024) and for fostering critical thinking and decision-making skills (Burgess & Yaoyuneyong, 2012). This reinforces its suitability as the methodological approach for addressing the main research question.

The selection of learning theories followed a purposive, theory-driven approach. Multiple learning theories were considered based on their relevance to professional accounting education and their potential to provide visual explanatory frameworks for proficiency levels. Particular emphasis was placed on theories that could be represented through concept mapping to enhance interpretability. From this process, Bloom's taxonomy and Vygotsky's ZPD were identified as most suitable, given their complementary explanatory power and visual applicability.

The concept mapping process was iterative and involved several stages: (1) familiarisation with SAICA's competency framework and tax technical proficiency levels; (2) identification and review of candidate learning theories; (3) alignment of theoretical constructs with proficiency-level descriptors; (4) development of initial concept maps; and (5) refinement of these maps through repeated comparison between theory and framework.

To enhance the credibility of the conceptual mappings, the emerging framework and manuscript were subjected to peer debriefing through informal review by academic colleagues in accounting education. Feedback from these peers confirmed that the concept maps improved clarity in distinguishing between proficiency levels, particularly levels 1 and 3. This iterative engagement contributed to the trustworthiness and practical relevance of the final conceptual model.

4. Concept Mapping of Learning Theories to Tax Technical Proficiency Levels

The tax technical competencies in the competency framework are addressed in sections A5 (Tax Strategy), C2.2 (Financing Decisions: Sources of Funds), C8 (Tax Law Implications) and E (Tax Governance and Compliance). Two significant additions, compared to the 2008 and 2016 versions, are Tax Strategy (A5) and Tax Governance: Tax Landscape (E1.1).

The proficiency levels assigned to tax technical competencies are largely at Level 1 or Level 2, with Level 3 reserved only for individuals and the evaluation of a taxpayer's profile. The individual competencies cover both employer and employee perspectives. Evaluation of a taxpayer's profile involves establishing VAT vendor status, determining residency, identifying the nature and source of income, classifying the taxpayer (e.g., as a small business corporation or a personal service provider), and recognising organisational structures such as connected persons and groups of companies. It is notable that the two recent additions, Tax Strategy and Tax Landscape, are both classified at Level 1.

This study first examined and mapped the learning theory explicitly identified in the competency framework preface, namely Bloom's taxonomy. It then considered an additional learning theory, which was mapped against the tax technical proficiency levels set out in the competency framework.

4.1 Concept Mapping of Bloom's Taxonomy

The preface to the competency framework refers to an adapted version of Bloom's taxonomy. In this version, the verbs associated with the cognitive domain place

“evaluate” at the fifth level and “create” at the sixth. This ordering differs from the original taxonomy, where “create” was fifth and “evaluate” sixth. The adapted hierarchy therefore progresses as follows: remember (Level 1), understand (Level 2), apply (Level 3), analyse (Level 4), evaluate (Level 5), and create (Level 6).

Drawing on the revised Bloom’s taxonomy and the tax technical proficiency levels specified in the competency framework, the author mapped these two dimensions, as illustrated in Figure 2.

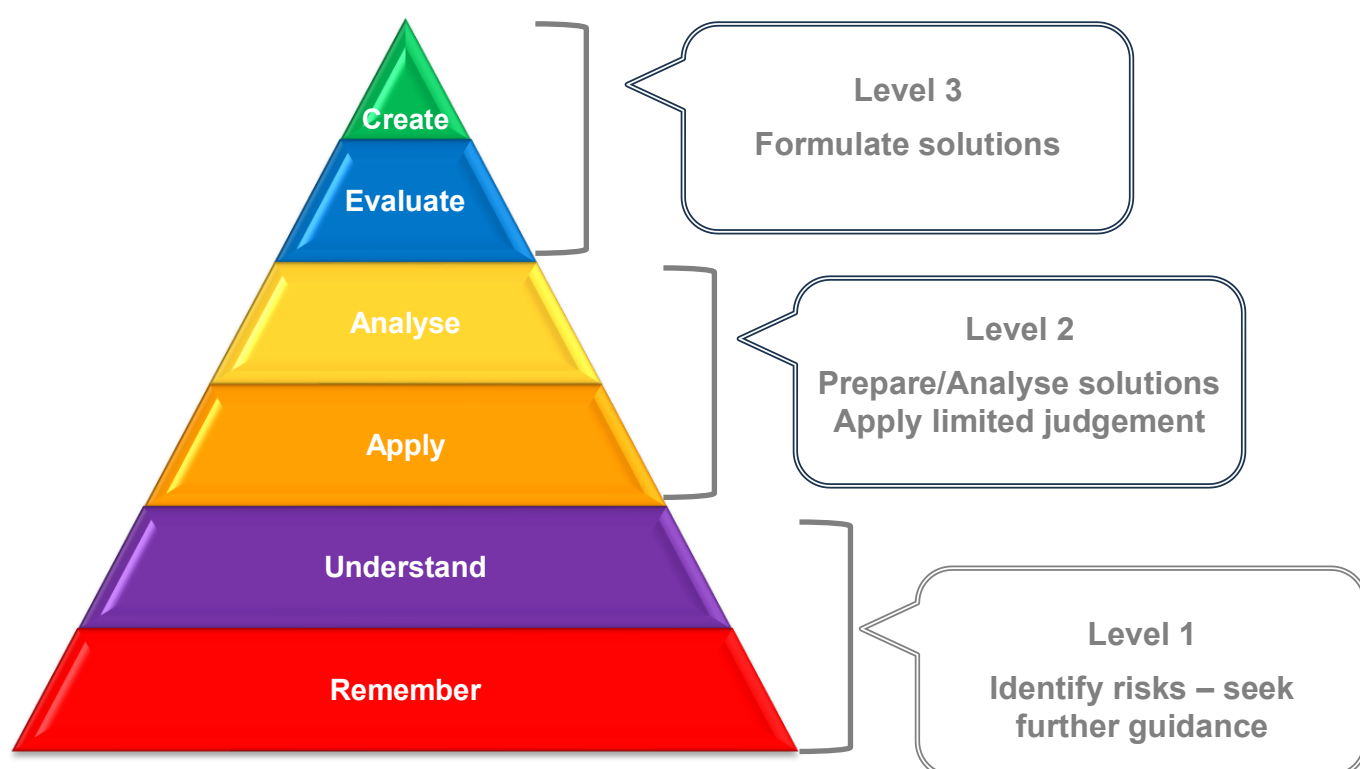


Figure 2: Mapping of tax technical proficiency levels to the revised Bloom’s taxonomy

As mentioned earlier, in SAICA’s competency framework, only two topics are classified at proficiency Level 3: taxation of individuals and the evaluation of a taxpayer’s profile. Most tax technical competencies fall at Level 2 or Level 1. It is therefore critical for students, as future CAs(SA), to understand the complexities of taxation and recognise the boundaries of their professional role. They should not offer expert tax advice or engage in the structuring of tax arrangements or planning schemes for taxpayers other than individuals. Equally important, lecturers and students must recognise that a Level 1 competency does not imply mere awareness, insignificance, or exclusion from assessment. Rather, Level 1 plays a vital role in equipping professionals to identify potential tax risk areas.

4.1.1 Distinction between Level 3 and Level 2

The distinction between the cognitive processes of analysis and evaluation in Bloom’s taxonomy is often subtle and challenging to apply, particularly during initial engagement with the competency framework.

According to the revised Bloom's taxonomy of Anderson and Krathwohl (2001), "analysing" entails breaking down materials or concepts into constituent parts to determine how they relate to one another and to the broader structure or purpose. This process includes mental actions such as differentiating, organising, and attributing, and requires distinguishing between elements. Analytical thinking may be demonstrated through tools such as spreadsheets, surveys, charts, or diagrams that clarify structural relationships. In taxation, this level aligns with assessments restricted to discussion and/or calculations based on predefined options. At this level, students are neither expected to produce open-ended responses involving tax structuring or planning advice, nor to critique tax opinions.

By contrast, Anderson and Krathwohl (2001) defined "evaluating" as making informed judgements based on criteria and standards, typically through checking and critiquing. Outputs demonstrating evaluative thinking may include critiques, recommendations, and formal reports. In the revised taxonomy, evaluation precedes creation, as it often provides the necessary assessment of ideas, processes, or products before they can be developed further. In taxation, the competency framework identifies only two areas at proficiency Level 3 that demand evaluative thinking: individuals and a taxpayer's profile. At this level, students may be expected to critique or provide expert tax advice, as well as engage in structuring tax arrangements or planning strategies. Similarly, entry-level CAS(SA) should be able to evaluate a taxpayer's VAT vendor status, residency, income nature and source, classification (e.g., as a small business corporation or a personal service provider), and organisational structures such as connected persons and groups of companies.

To help students grasp the nuanced distinction between "analyse" and "evaluate", the visual representation in Figure 3 provides a useful aid.



Figure 3: Difference between analysing and evaluating (Darwin, 2021)

Assessments require careful consideration of the action verbs used in assessment requirements, as these verbs convey the expected level of cognitive engagement. For instance, assessment instructions may include verbs such as "criticise", which are commonly associated with higher-order cognitive processes aligned with evaluation and are therefore typically indicative of a Level 3 competency. Where the intended

assessment level is lower, alignment can be achieved through appropriate contextualisation of both the information provided and the wording of the requirement. In such cases, assessment tasks can clarify that student responses are subject to review or confirmation by a more senior or experienced individual, thereby aligning the task with the intended competency level.

4.1.2 Distinction between Level 2 and Level 1

The concept of Level 1 is frequently misunderstood by both lecturers and students. Before the introduction of the competency framework, guidance on examinable content was provided through the Tax Examinable Pronouncements, which listed specific sections and paragraphs deemed examinable. This document used a three-level system, in which Level 1 denoted mere awareness. As a result, Level 1 content was often perceived as relatively insignificant and not examinable. The interpretation of Level 1 in the current competency framework is fundamentally different. It extends well beyond simple awareness and rather requires a sound understanding of the core principles underlying a given topic or section, the ability to explain their relevance and significance, and, crucially, the capacity to identify potential risks in practice.

To clarify expectations at Level 1, particularly in relation to trusts, the author prepared a document for the SAICA Examination Committee. Following refinement with the Committee's input, the document was disseminated to academics on 11 December 2024. The illustrative example of trusts is set out in Annex 1.

At the foundational level of competency, the example of trusts illustrates that students must understand key principles (such as vested rights, the flow-through principle, and section 25B) together with their main exceptions. The focus is not on detailed technical solutions, but on risk identification through the formulation of appropriate questions concerning the trust structure, its funding, and the status of beneficiaries. Figure 4 illustrates the steps that characterise foundational competency at Level 1.

Understand key principles ⇒ **ask appropriate questions** ⇒ **identify risk**

Figure 4: Steps characterising foundational competency at Level 1

Having mapped the tax technical proficiency levels to Bloom's revised taxonomy and clarifying the distinctions between the six levels, the next step was to consider additional learning theories that may align with these competencies. Among these, Vygotsky's theory (1978) offers particular explanatory value, especially for managing expectations and interpreting proficiency levels. Vygotsky's (1978) concept of the ZPD is a seminal contribution to sociocultural learning theory and has been widely applied in higher education contexts.

4.2 Concept Mapping of Vygotsky's Theory

Vygotsky's sociocultural theory, and particularly the concept of the ZPD, provides a valuable framework for interpreting SAICA's three proficiency levels. The ZPD describes the gap between what learners can achieve independently and what they can accomplish with guidance. Although originally developed in the context of child

development, these principles are equally applicable to adult learners and have been widely adopted in higher education (Rosser-Mims et al., 2017). This perspective aligns with adult learning principles such as collaboration, contextualisation, and critical reflection, offering a dynamic approach to supporting professional growth. Building on this foundation, the present study argues that the ZPD can be effectively aligned with SAICA's tax technical proficiency levels, as illustrated in Figure 5.

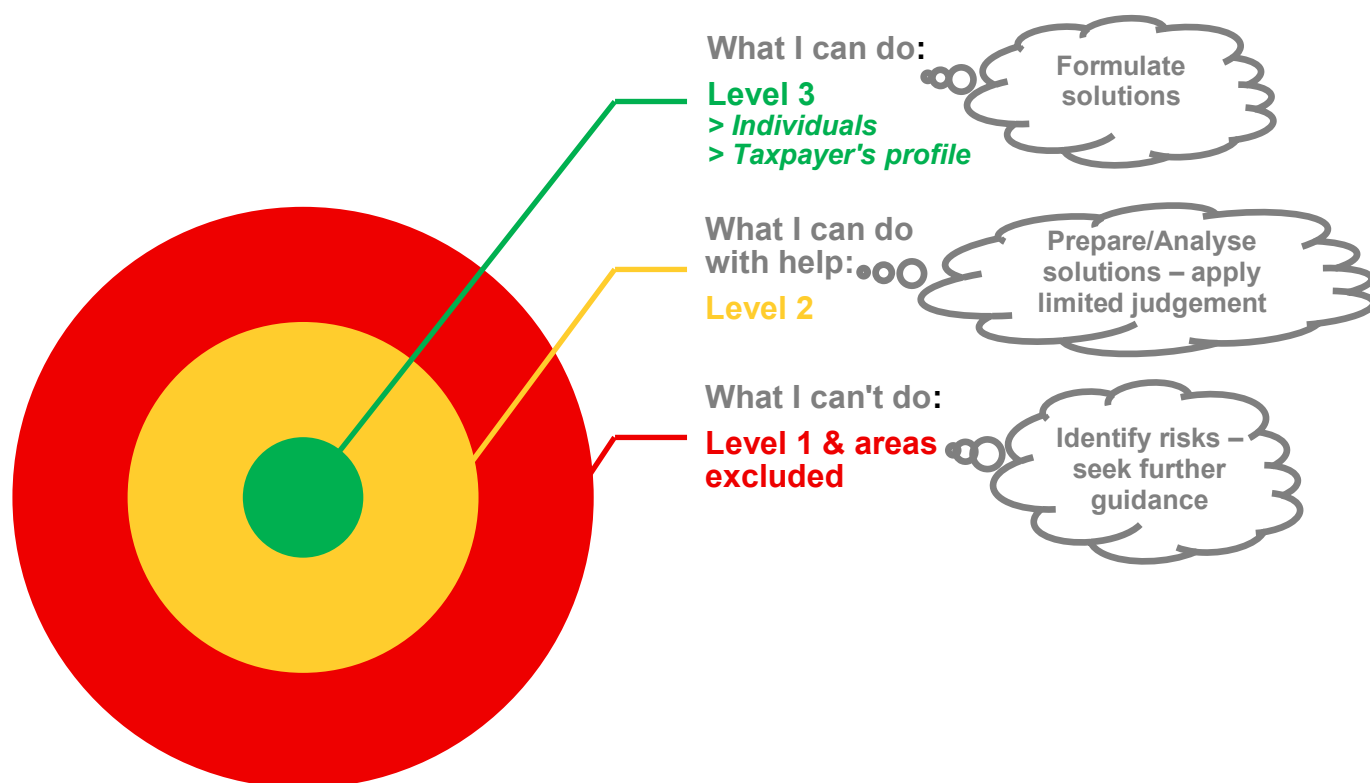


Figure 5: Concept mapping of Vygotsky's theory (1978)

The concentric-circles diagram illustrates the progressive development of competencies for CAs(SA), aligning with Vygotsky's ZPD (1978). Level 1 represents the ability to identify risks and issues: CAs(SA) can recognise problems but require guidance to resolve them. Importantly, Level 1 should not be misconstrued as superficial awareness. Rather, it requires a solid grasp of underlying principles and contexts, as effective risk identification depends on substantial understanding. For example, the definition of a controlled foreign company appears in the Tax Knowledge List because it enables professionals to recognise when a foreign structure may fall within the scope of anti-avoidance legislation under section 9D.

Level 2 involves preparing and analysing solutions, enabling professionals to engage in structured problem-solving with limited independent judgement and under supervision. It represents the transitional space in the ZPD, where learners move beyond basic recognition of issues (Level 1) but are not yet expected to provide evaluative judgements or independent recommendations. At this level, lecturers play a key role in scaffolding by setting appropriately challenging tasks and clarifying the boundaries of competency, ensuring that students apply principles accurately while still relying on oversight.

Level 3 signifies full professional competency. At this level, Cas (SA) can independently formulate solutions, exercise critical judgement, and provide strategic advice. The model demonstrates how accountants progress from recognising issues to independently resolving complex professional challenges, underscoring the importance of experience, mentorship, and collaborative learning.

This progression also highlights the importance of accurately interpreting Level 1. Framed within Vygotsky's ZPD, Level 1 should be understood as a substantive stage of professional development rather than as superficial awareness. It demonstrates that effective risk identification depends on a meaningful understanding of underlying principles and contexts, providing the essential foundation on which higher levels of competency are built. In this way, Vygotsky's framework not only clarifies the developmental pathway envisaged in SAICA's competency framework but also offers practical guidance for lecturers in calibrating expectations and designing tasks that recognise the formative value of Level 1 in professional accounting education.

5. Broader Applicability and Transferability Beyond the SAICA Competency Framework

As outlined in the Introduction, the SAICA competency framework is situated in the international context established by IFAC through its adoption of the IES. In this way, it integrates technical competency (IES 2), professional skills (IES 3), and professional values, ethics, and attitudes (IES 4). Because this study focused on technical competency, particular attention was given to the guidance provided in IES 2 with respect to taxation.

Taxation is explicitly recognised in the revised IES 2 (effective 1 July 2026) as one of the competency areas prescribed for aspiring professional accountants (IFAC, 2025). The learning outcomes for technical competency in taxation are presented in Table 2.

Table 2: Learning outcomes for technical competency

Competency area (level of proficiency)	Learning outcomes
(d) Taxation (Intermediate)	(i) Explain national taxation compliance and filing requirements
	(ii) Prepare direct and indirect tax calculations for individuals and organisations
	(iii) Analyse the taxation issues associated with non-complex international transactions
	(iv) Explain the differences between tax planning, tax avoidance, and tax evasion

Source: IFAC (2025, p. 6)

Several observations arise when comparing SAICA's framework with IES 2. First, SAICA includes an additional column specifying the "minimum content", which provides significantly more detailed guidance on the scope and application of each taxation-related learning outcome. This makes SAICA's treatment of taxation more comprehensive and context-specific than that of IES 2. Second, in the revised IES 2, taxation is linked exclusively to the intermediate level of proficiency (Level 2). This

contrasts with SAICA's competency framework, which distributes taxation competencies across multiple proficiency levels. Third, SAICA's competency framework not only incorporates the four taxation outcomes listed in IES 2 but also extends considerably beyond them. For example, additional learning outcomes include the following (SAICA, 2025b):

- "(a) identifying the tax implications that may arise from changes in control or ownership structure and calculating the tax consequences of financing and investment decisions;*
- (b) explaining and calculating the taxation implications of returns to investors for both the business and the investor; and*
- (c) ...*
- (d) explaining and calculating the tax implications of possible courses of action for a financially troubled business from the perspective of both the business and its stakeholders." (p. 67)*

In addition, SAICA's competency framework explicitly incorporates learning outcomes on emerging issues such as tax governance, tax strategies, tax risk management, and tax morality. These inclusions reflect SAICA's alignment with global developments in responsible tax practice, an emphasis not explicitly evident in IES 2. Finally, the explanatory material in IES 2 clarifies that the listed learning outcomes are intended to provide a foundation upon which professional accountants may later develop specialisations in various roles, including taxation. This confirms that the taxation competency area is designed to establish a broad generalist foundation rather than to produce taxation specialists – an approach consistent with SAICA's competency framework.

The insights from this study should not be viewed as confined to taxation alone. The conceptual mapping of learning theories to proficiency levels has broader applicability across other disciplines, including financial accounting and reporting, management accounting, financial management, and assurance. Extending the framework in this way highlights its relevance for professional education more generally, offering lecturers a tool for calibrating expectations and designing assessments across multiple domains. This transferability strengthens the contribution of the study by demonstrating its value not only for taxation but also for the wider project of developing competent, ethically grounded professional accountants.

6. Conclusion

This study addressed a persistent challenge in professional accounting education: the interpretation and application of SAICA's tax technical proficiency levels as articulated in the competency framework. Uncertainty continues to surround the differentiation of the three proficiency levels – Foundational (Level 1), Intermediate (Level 2), and Advanced (Level 3) – a challenge that affects lecturers in their teaching and assessment practices and students in understanding expectations. Concept mapping was employed as both a research methodology and an educational tool to demonstrate how learning theories can be systematically aligned with tax technical competencies. In doing so, the study offers a novel conceptual framework that

integrates learning theories with SAICA's proficiency levels. Bloom's taxonomy provides valuable insight for distinguishing between levels 2 and 3, particularly the difference between analysing and evaluating. However, its hierarchical structure offers limited explanatory power on its own, as it does not fully capture the nuances of all three levels. To address this limitation, the study incorporated Vygotsky's ZPD theory, which clarifies the foundational nature of Level 1 in terms of risk identification and guided learning. When considered together, Bloom's taxonomy and the ZPD provide a more comprehensive framework for interpreting proficiency levels, combining a cognitive lens for higher-order skills with a developmental perspective on progression. This integrated approach resolves key areas of ambiguity by offering a coherent explanation across all three proficiency levels.

From an implementation perspective, lecturers can integrate this framework at the start of the academic year, for example, through an introductory learner guide. This can be reinforced by aligning topic-specific learner guides with the designated proficiency levels, ensuring that teaching, learning activities, and assessment are explicitly mapped to Level 1 (risk identification), Level 2 (structured application), and Level 3 (evaluation and judgement). Such alignment supports clarity of expectations and helps manage syllabus overload. By providing lecturers and students with a structured, theory-informed lens for interpreting proficiency levels, the concept maps function as a practical tool for clarifying expectations, guiding learning strategies in taxation, and designing assessments. While developed in a taxation context, the framework has broader applicability across other technical disciplines within accounting education, including financial accounting, management accounting, and assurance, and may be transferable to other fields adopting competency-based education models.

Future research could empirically test these conceptual maps in higher education settings to evaluate their effectiveness in reducing cognitive overload and improving student outcomes. Extending the mapping exercise to other technical competencies would further strengthen professional accounting education, while reinforcing the relevance of competency-based approaches in a VUCA environment.

"The risk with tax is not what you know, but what you don't know."

7. AI Disclosure Statement

The author used ChatGPT-4o strictly for language editing and to improve the readability of the manuscript. The intellectual content, data analysis, and conclusions were developed solely by the author, who takes full responsibility for the integrity and accuracy of the work.

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Annex 1: Example of competency framework for Level 1

Using trusts as an example to explain the technical competencies of Level 1, the foundational level:

	1 Foundational level of competency
<i>Knowledge dimension</i>	Identify and describe the key ideas/principles/fundamental concepts of the subject matter pertaining to routine and non-routine situations (technical expertise or detailed knowledge not required).
<i>Application dimension</i>	Identify and explain the significance and relevance of the subject matter and recognise the linkages with other subject matter.
<i>Problem-solving dimension</i>	Recognise issues when encountered and seek further depth/guidance.

Knowledge dimension: Identify and describe the key ideas/principles/fundamental concepts of the subject matter pertaining to routine and non-routine situations, such as that there are different types of trusts. The role players in a trust structure: the donor, the trustees, and the beneficiaries. Understanding fundamental concepts applicable to trusts, such as what does vested rights mean, what does the flow-through principle mean, what does retain its nature mean, that is, verbalise and say that interest remains interest in the hands of the beneficiary/donor/trust, or dividend income streams will remain dividend income in the hands of the beneficiary/donor/trust. In addition, students should understand that the flow-through with regard to “income” will not apply in three instances, namely where:

- there was a donation, settlement, or other disposition;
- the beneficiary is not a resident in the Republic of South Africa; and
- with respect to capital gains, the beneficiary is another trust with discretionary beneficiaries.

One of the core concepts outlined in the requirements is the ability to identify and explain the significance and relevance of the subject matter and recognise the linkages with other subject matter(s). As such, students will still need to have a detailed understanding of how trusts work with regard to both s24B and the relevant paragraphs of the Eighth Schedule.

Application dimension: A candidate should be able to have a conversation about trusts (i.e., verbalise the issues and explain the thought process). For example, a candidate should be able to communicate that the starting point for trusts is section 25B: If the beneficiary has a vested right, the beneficiary will be taxed, meaning the flow-through principle will apply. If the beneficiary is, however, a non-resident, the trust will be taxed. For any funds retained in the trust, the trust will be taxed.

Students should also be able to take the trust concepts and apply them to applicable anti-avoidance provisions. For example, if there was an actual donation or a similar disposition, anti-avoidance provisions may override, in which case the donor will be taxed, and not the beneficiary/trust.

Students should also understand that the residency of the donor can impact the tax consequences as well. Regarding actual donations: It is important to note that even though an actual donation triggers actual donations tax payable, the anti-avoidance provisions could still apply. Regarding “similar disposition”: A loan not bearing interest at a market-related rate is an example of a similar disposition. In all instances, for the anti-avoidance provisions to potentially apply, the donor must still be alive. The nature of the income should also be considered, as section 7 will be considered for revenue streams, whereas the Eighth Schedule will be considered for capital nature streams. Furthermore, there are limitation principles that may apply to the amount attributed to the donor. Lastly, any loans to a trust, directly or indirectly, at the instance of a natural person may trigger additional donations tax in terms of section 7C if the loan is not bearing interest at least at the official rate of interest.

To summarise the interplay between donations and trust, these are the key points our students would need to understand:

- Whether there is a deemed or an actual donation.
- The residency of the donor.
- That the payment of donations tax does not influence the attribution rules.
- The interplay between “normal” tax rules, s25B, and anti-avoidance provisions, which takes precedence.

Problem-solving dimension: Recognise issues when encountered and seek further depth/guidance. If a trust structure exists, recognise the questions that should be raised to identify risks: What type of trust is it? How was the trust funded? Is the donor still alive? Who are the beneficiaries? What are the ages of the beneficiaries? What is the residency status of the beneficiaries? Did any amounts vest during the year? Did the trust receive a loan at the instance of a natural person, whether directly or indirectly? The reason(s) for asking these questions should obviously also be communicated. The main objective is to identify risks in order to consult/contact a tax specialist. This is the key point: The student is not expected to be able to have a complete answer. The risk identification is the examinable content.