

30 September 2020

General Manager  
Policy Development  
Policy and Advice Division  
Australian Prudential Regulation Authority (APRA)

[PolicyDevelopment@apra.gov.au](mailto:PolicyDevelopment@apra.gov.au)

Dear Sirs

## Private Health Insurance Capital Standards Review

We are writing in response to APRA's discussion paper on the private health insurance (PHI) capital standards review, which was released in December 2019.

Finitly staff have contributed to a number of submissions, and so we have decided not to provide a formal submission from Finitly at this time. In particular, Finitly actuaries were part of the team which prepared the detailed Actuaries Institute response. We have also assisted insurers and industry groups in responding.

We have encouraged industry debate and discussion on capital in PHI, including through our PHI capital d'finitive (link below), and at a CFO forum attended by the majority of health fund CFOs.

[https://www.finitly.com.au/wp-content/uploads/2019/12/Hi\\_dfinitive\\_Dec\\_2019\\_sec.pdf](https://www.finitly.com.au/wp-content/uploads/2019/12/Hi_dfinitive_Dec_2019_sec.pdf)

Finitly's health insurance experts are available to assist APRA's PHI experts as they review the capital standards. We look forward to working with APRA through the next phase of consultation.

Yours sincerely

Fri 3 December 2021 2:14 PM

jr\K:\PRACTICE AREAS\PRIVATE HEALTH INSURANCE\APRA CONSULTATION\CAPITAL 1119\L\_APRA PHI CAPITAL STANDARDS REVIEW - FINITY.DOCX

### Sydney

Tel +61 2 8252 3300  
Level 7, 68 Harrington Street  
The Rocks, NSW 2000

### Melbourne

Tel +61 3 8080 0900  
Level 3, 30 Collins Street  
Melbourne, VIC 3000

### Auckland

Tel +64 9 306 7700  
Level 5, 79 Queen Street  
Auckland 1010