

20 June 2022

APRA
General Manager
Data Analytics and Insights

CBHS Health Fund Ltd supports APRA data collections strategy by moving the collection of all data onto APRA connect. During the last 12 months CBHS has successfully been using APRA connect for the lodgement of the APRA 605 return. While initially we found it challenging as a result of the significant validation checks implemented for 605, once we overcome these hurdles, we have found APRA connect easy to use.

We believe APRA's vision for data collection is also closely aligned to the CBHS strategy for data collection. CBHS believes the collection of good quality data is important as it allows for more informed decisions to be made. During the last few years CBHS has increased its budget on data collection, has upgraded data collection software capabilities and making investments in AI capabilities.

There are still 4 returns (601, 602,603 and 604) that are lodged via D2A and based on the APRA transition times frames these returns will be lodged via APRA connect commencing 1 January 2024. It is interesting to note that APRA made a comment 'collection from 2024 onward require further development. Scope and timing are indicative' which suggests that the templates for 601, 602, 603 and 604 will be changing. With the current work loads around implementation of AASB17, CBHS understands that 602 must be revised and updated so that it takes into consideration AASB17 implementation however we would suggest that changes to 601, 603 and 604 be delayed until AASB17 has been fully implemented.

With the potential request from APRA on new data and more granularity, CBHS would suggest that APRA conduct forums with health funds to discuss what additional new data and granularity is required rather than APRA sending a request without consulting health funds.

Yours Sincerely



John Terzis
Finance Manager