



**AUSTRALIAN DENTAL
ASSOCIATION INC.**

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All Correspondence to:
PO Box 520 St Leonards NSW 1590

19th May 2015

Mr Pat Brennan
General Manager
Policy Development
Policy Statistics and International
Australian Prudential Regulation Authority
GPO Box 9836
SYDNEY NSW 2001

By email: privatehealthinsurance@apra.gov.au

Dear Mr Brennan,

**Re: FEEDBACK ON APRA DISCUSSION PAPER DATED MARCH 2015
SUPERVISION OF PRIVATE HEALTH INSURERS IN AUSTRALIA**

Thank you for the opportunity to continue to be involved in the development of the new framework for APRA's supervision of private health insurers in Australia.

The ADA's wishes to comment on two issues:

1. APRA's proposed approach to the release of Private Health Insurance Administration Council (PHIAC) data to third parties; and
2. The obligation, if any, on APRA to assist consumers to *make informed choices about private health insurance* (PHI).

The ADA is encouraged by APRA's confirmation that the statutory report issued under section 264.15 of the *Private Health Insurance Act 2007* (PHI Act) will continue to be published and made publicly available by APRA. We understand that a provision in the proposed *Private Health Insurance (Prudential Supervision) Act* will replicate the obligations under section 264.15 of the PHI Act.

Confirmation is now sought from APRA about the availability of all the other information currently accessible on the PHIAC website (<http://phiac.gov.au/>). Will APRA maintain an internet presence containing identical information to that currently provided by PHIAC?

One of the important functions of PHIAC has been the collection and dissemination of information about PHI *to enable people to make informed choices about PHI* (see section 264.10(5) of the PHI Act). In previous submissions to the Department of Treasury concerning this new framework, the ADA has referred to the importance of this obligation for consumers. The prudential standards proposed by APRA to date are unclear on this aspect.

Will APRA be subject to an obligation similar to that imposed on PHIAC pursuant to section 264.10(5) to provide members of the public with information to make informed choices about PHI? If not, which agency will be responsible for this important role?

The ADA would appreciate clarification from APRA of these issues.

If necessary, we are available to meet with APRA. Please contact Mr Robert Boyd Boland, Chief Executive Officer of the ADA at _____ if you would like to meet.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R. Olive', is positioned above a horizontal dashed line.

Dr Rick Olive AM RFD
Federal President