



nabhealth

18th May, 2015

Mr Pat Brennan
General Manager, Policy Development
Policy, Statistics and International
Australian Prudential Regulation Authority
GPO Box 9836
SYDNEY NSW 2001
privatehealthinsurance@apra.gov.au

Re: Proposed prudential and reporting framework for APRA's supervision of private health insurers

Dear Mr Brennan,

I refer to the Discussion Paper – Proposed prudential and reporting framework for APRA's supervision of private health insurers in Australia – March 2015. NAB would like to comment specifically on confidentiality of the data submitted to APRA under FSCODA on page 5 and in more detail in Chapter 4.

NAB provides a number of financial products and services to the health insurance sector including Direct Debit, Merchants, Online Banking Facilities & Limits as well as Business Credit Cards. In order to manage the risk associated with provision of these services, we rely on individual financial reporting from the health funds directly, as well as industry reports and information provided by PHIAC.

Specifically, NAB rely on the 'Operations of the Private Health Insurers Annual Report – Statistical Tables and Indexes' which provides a full breakdown by insurer including revenue, benefits, expenses, profitability, assets & liabilities, membership, revenue, expenses by insurer, health-related business <http://phiac.gov.au/about/publications/>. If this information was not to be made available publicly, we would look to request this information via the Freedom of Information Act 1982.

NAB also relies on the information and data that is contained in the Quarterly Statistics report. NAB is also on the PHIAC distribution list which provides us with information on any regulation or prudential standard or framework amendment, announcements, or changes that may impact the private health insurance sector. NAB would like to continue to receive all of this information as it is an important and valuable resource.

Please contact me on Mobile: if you require any further information.

Yours faithfully,

Melissa Timbs
Snr Policy Advisor NAB Health

Email:

Cc: Jennifer Darbyshire, General Manager Regulatory Strategy & Affairs