

Sean Carmody  
Executive General Manager  
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Australia Prudential Regulation Authority

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Dear Mr Carmody

**Response to the new Data Collection Solution/D2A replacement**

Thank you for the opportunity to provide feedback regarding the replacement of D2A and the new Data Collection Solution from private health insurers.

The rt group consists of two funds: rt health, a not-for-profit mutual fund with a membership restriction within the transport and energy industries, and Transport Health, a for-profit, unrestricted membership fund.

Under the group environment, we prepare the quarterly and yearly APRA reports within Excel environment and convert the APRA reports from Excel format to html format which is the only acceptable format by the current D2A environment. We view this as a step that adds no value to the reporting process and it is exposing the reporting process to more changes of error from data transforming. It will be convenient if the new Data Collection Solution can accept Excel format as the current HRF reports template prescribes.

We appreciate the live checking function in D2A that provides instant feedback on any data error. We would like to see the new data collection solution to continue this function.

The current D2A does not allow a user friendly download of previous quarters' reports. The download is only in pdf format, and pdf format is not easily convertible to Excel which is more often used at data preparation. We would like to be able to download the past submissions in Excel format.

We are aware of the coming industry consultation sessions in April and we will be attending them.

We look forward to more updates of D2A replacement.

Thank you again for reaching out for feedback. If you require further details or clarifications, please do not hesitate to contact me on 02 9910 4435 or [TheoT@rthealthfund.com.au](mailto:TheoT@rthealthfund.com.au).

Yours sincerely



Theo Theodore  
Group Chief Financial Officer  
rt group