

Senate Select Committee on Superannuation and Financial Services

Main Inquiry Reference (a)

Submission No. 61 (Supplementary to Submission
No. 50)

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23 JUN 2000

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Your Ref:
Our Ref: NC/215/ADM

22 June, 2000

Senator John Watson
P O Box 662
Launceston Tas 7250

Dear Senator Watson

Severe Financial Hardship Claims

I refer to my letter 1 June, 2000 and your letter 7 June, 2000.

I have enclosed for your information a copy of the discussion paper that was tabled at a Tasplan Board meeting held 21 June, 2000.

The purpose of the paper was for the Board to consider the whole issue of Severe Financial Hardship Claims as provided by Tasplan.

The decision of the Board is to retain the benefit for members in the interim, subject to discussions with Centrelink to review the mechanism as Tasplan is not in the business of, nor capable of, assessing such claims.

It is the Boards intention to withdraw the availability of the benefit if the process is not modified. The effective date of withdrawal is, most likely, 1 February, 2001.

I trust that the document will be of benefit to highlight to authorities the difficulties confronting superannuation funds in dealing with this Regulation and subsequent amendment thereof.

Yours sincerely

Neil Cassidy
General Manager

TASPLAN

SEVERE FINANCIAL HARDSHIP

The following paper sets out Tasplan Severe Financial Hardship issues under the following headings.

1. Introduction
2. Superannuation Industry (Supervision) Regulation
3. Guidelines for Trustees
4. Tasplan Rules
5. Tasplan Administration
6. Summary

1. INTRODUCTION

Severe financial hardship is a benefit that may be made available to the members of a superannuation fund. The provision of the benefit is totally at the discretion of the Trustees.

Many funds, including Tasplan, have made the decision to allow members to apply for the benefit. Some funds including REST do not allow for member application of the benefit.

The rules and procedures to assess such claims are also at the discretion of Trustees although guidelines have been issued to provide Trustees with assistance in administering applications made to them for the early release of preserved benefits and restricted non-preserved benefits.

The guidelines on the test of whether a person is "unable to meet reasonable and immediate family living expenses" (the subjective test) are only guidelines – they are not "law". Trustees have flexibility in how they administer this subjective test.

2. SUPERANNUATION INDUSTRY (SUPERVISORY) REGULATION

In accordance with the Superannuation Industry (Supervisory) Act 1993, (the Act) there is provision for the early release of benefits subject to terms and conditions

approved and determined by the Trustee relating to the provision of certain benefits.

Generally, no cashing restrictions or additional tests apply for the release of benefits in the case of the retirement, death or permanent incapacity of a member or when the member attains age 65. However, specific rules must be met for the operation of other conditions of release.

For the release of benefits to a person because of "severe financial hardship", the Trustee must be satisfied that:

- the person had been receiving Commonwealth income support payments (e.g. an income support supplement, a service pension, or a social security benefit or pension) for the continuous period of at least 26 weeks, and is unable to meet reasonable and family living expenses.
- for a person who has attained his or her preservation age plus 39 weeks – the person has received Commonwealth income support payments for a cumulative period of 39 weeks after attaining the relevant preservation age and was not gainfully employed on a full-time or part-time basis on the date of application for early release of benefits (Reg 6.01 {5}).

Even where these rules are met, cashing restrictions still apply to limit the amount of the benefits payable, e.g. the maximum amount that can be released under reg. 6.01 (5) (a) is \$10,000 in each 12 month period (Sch1, Item 105).

3. GUIDELINES FOR TRUSTEES

As mentioned, guidelines have been issued for Trustees to determine possible automatic releases, appropriate forms to assess claims, the nature of an expense, and the "reasonableness" of a claim. These guidelines have been produced by the superannuation regulators and are comprehensive. They provide a clear insight into the complexities that surround the nature of such claims and the decisions confronting Trustees. The consideration of claims, which are guidelines only, are summarised as follows:

Meaning of 'unable to meet reasonable and immediate family living expenses'

In assessing whether a person has assets that could be used to meet reasonable and immediate family living expenses, the family home is excluded from consideration.

Essentially, for a single applicant the phrase means there is a gap between his/her personal income and his/her expenses which are associated with everyday living; and the person has no assets

which could, (reasonably and realistically speaking), be used or sold to cover the gap, apart from the asset of the preserved superannuation benefits.

For an applicant with a family, the phrase means there is a gap between the combined income of the applicant and his/her family and the combined family expenses which are associated with the everyday living of the family; and the combined assets of the family could not, (reasonably and realistically speaking), be used or sold to cover the gap, apart from the asset of the preserved superannuation benefits.

Some Trustees may consider that a member should not be forcing his or her dependants to contribute any income they derive to satisfy debts incurred by the member. However, for the purposes of determining whether the subjective test is satisfied, the most sensible guide for Trustees is that if an applicant has a family, then that family's combined resources and outgoings should be considered. To make assessments without regard to the whole family's position, could lead to unjust decisions being made, involving either unjustified release or unjustified non-release.

Regulation 6.01(5)(a) is silent on what period needs to be taken into consideration for the purposes of determining the amount to be released. However, Schedule 1 of the SIS Regulations refers to the maximum amount that can be released in each 12 month period. For administrative efficiency and convenience trustees may decide to release an amount which would alleviate the shortfall in income for a 12 month period. However, they may consider that an applicant's financial circumstances could improve within 6 months, and therefore decide to release an amount, based on a shortfall for a 6 month period. Ultimately, it is a decision for the Trustees, taking into account all relevant circumstances.

Possible 'automatic' releases

As an alternative to detailed assessments being made by Trustees of an applicant's income and expenses, Trustees may decide, as a matter of administrative efficiency and convenience, that if an applicant satisfies the objective test in Regulation 6.01 (5)(a), then they satisfy the *subjective* test, if certain factors exist. These factors could include matters relating, for example, to the small size of the superannuation benefits held, (e.g. if they are \$10,000 or below);) and/or if the total value of net assets held (excluding the family home) is below \$50,000; and if the amount sought to be released is under, say \$5,000. These suggested 'threshold figures' are only a

guide for Trustees. Ultimately, Trustees have a discretion to determine when the subjective test is satisfied.

If Trustees choose to adopt this 'automatic' release system, they will need to enquire into the value of an applicant's assets (apart from the family home). A statutory declaration could be used to obtain relevant information from the applicant i.e. information as to the size of the account and the net value of assets apart from the home.

If however, a case falls outside any 'threshold figures' determined by a Trustee as relevant to his/her particular fund, the following comments on more detailed assessments can be used by Trustees as assistance in developing their own internal guides to determine whether the subjective test has been satisfied.

Form for assessing inability to meet reasonable immediate family living expenses.

The guidelines provide a suggested form for completion by applicants for early release of their superannuation benefits. This form requests information which will assist Trustees to assess whether there is an inability of the applicant to meet reasonable and immediate living expense. Tasplan has developed its own form based on the pro-forma included with the guidelines.

The sample form does not suggest that information about assets owned by an applicant is sought, as it is assumed that, if such persons are on means tested Commonwealth income support, their assets (apart from the family home) are not significant, and certainly they could not reasonably, and realistically speaking, be used or sold, to cover a gap between income and expenses.

Sometimes applicants will include expenses which are clearly not 'reasonable' or 'immediate' or which are clearly not in the category of a 'family' living expense.

In some instances, it may not be clear whether an expense is 'reasonable' and/or 'immediate'. In these cases, Trustees are advised not to automatically reject the expense but to carefully consider the particular facts of each case, before deciding whether or not to accept the expense.

What is a 'reasonable' family living expense

The 'reasonableness' test refers to both the nature of the expense and the amount claimed for it.

The nature of the expense

The types of items that can, at the discretion of the Trustee, be considered to be 'reasonable', will depend on the circumstances of the case (e.g. the age, state of health, location of an applicant and/or his/her dependants).

Additionally, some applicants may have above average expenses, for example special school tuition fees for their children. Such expenses should not automatically be rejected by trustees as relevant to the subjective test. This is because generally speaking, these types of expense may have been paid out for some time, and it would not be reasonable to expect parents to immediately remove their children from special schooling arrangements even if they are experiencing severe financial hardship. Applicants will need time to adjust to their reduced financial circumstances. In any event, their financial circumstances may improve (e.g. if employment is obtained). In other words, Trustees should 'take applicants as they find them'.

The amount claimed

Trustees may decide, as a matter of administrative efficiency and convenience that certain 'maximum' amounts should apply to the usual living expenses, e.g. so much for the weekly food, clothing, rent, etc. expenses.

If Trustees choose to administer the subjective test by this means, then it needs to be stressed that if an applicant claims that he/she is paying more than this 'maximum' amount, for a particular item, a Trustee should not automatically disallow the amount exceeding the 'maximum' because of an applicant's particular circumstances may be unusual and the additional amount of expense may be fully justifiable.

What is an 'immediate' living expense

An 'immediate' living expense is one that is, at the time of the early release of benefits application, due and payable.

Arrears are clearly covered.

With credit cards, it is only the amount that is in arrears and the amount that is billed as 'minimum amount due' which can be considered an 'immediate' living expense.

Trustees may decide not to release money to enable an applicant to pay outstanding credit card balances above the 'minimum amount due' as the

portion of the debt not in arrears or 'minimum amount due' is not an 'immediate' living expense. However, if a strict application of this principle is adopted, then in some cases, this could lead to a 'debt spiral'. This could occur where an applicant cannot even pay minimum amounts due on several credit cards and debt levels continue to rise.

In such cases, Trustees could use their discretion to agree to release sufficient money to reduce overall debt to a level that the applicant could service from his/her reduced income.

Generally speaking, an anticipated expense, for example, for a service not yet provided to the applicant, but anticipated, is not an 'immediate' expense.

However, Trustees may, in certain circumstances, accept an expense as 'immediate' if the expense *will* (i.e. in the sense of undoubtedly) become payable very soon. Examples could include:

- money to be paid for household repairs required to be done urgently but not yet commenced, such as a leaking gas stove; and
- money to be paid for urgent dental work that must be done very soon.

What is a 'family' for the purpose of family living expenses

'Family' should be given a broad interpretation to reflect changing social values. Clearly covered would be spouse, defacto partners, parents living with an applicant, children, and stepchildren, Also covered would be same-sex couples living in bona fide domestic relationship and foster children.

Can 'business expenses' be 'family living' expenses'

It is possible for a person operating a business to be eligible for Commonwealth income support. The issue of 'business expenses' can therefore become relevant in assessing eligibility for early release of benefits on severe financial hardship grounds.

Generally speaking, 'business expenses' should not be accepted as 'family living expenses'. Usually, there is a distinction between domestic/private/ family expenses and expenses associated with conducting a business. For example, contrast the mortgage repayments or rental payments owing on a home with the rent payable in respect of business premises or insurance premiums payable on the family home as distinct from insurance premiums payable in respect of business premises.

The issues as to when business expenses can be counted for the purpose of assessing whether a person is unable to meet their reasonable and immediate family living expenses can arise when a business is continuing; when a business is failing; and also where a business has already failed. In any of these circumstances if an applicant is personally liable for business debts or personally liable for the debts of the former business, such expense may be relevant to an inability to meet reasonable and immediate family living expenses.

Sometimes family and business affairs or family and business expenses are intermingled to such an extent that the distinction becomes blurred. For example, a shopkeeper may live on the business premises, and use his motor vehicle for business and private purposes.

In these cases, the business expense that may be accepted by Trustees as falling into the 'family living expenses' category would, again, include those for which an applicant is personally liable.

Claims that inability to pay business expenses will lead to the loss of the business and consequent inability to pay for family expenses.

Trustees should not accept such claims, as the Regulations do not permit release in these circumstances. The test is actually to pay family expenses, not a possible, future inability to pay family expenses, should the business not survive.

4. TASPLAN RULES

Under the terms of the Trust Deed, Tasplan Trustees have exercised their discretion to allow members to apply for such benefits. The Tasplan rules as adopted by the Trustees are as follows:

Early Release of Benefits

Tasplan Administration Committee

In accordance with the Superannuation Industry (Supervisory) Act 1993 (the Act) there is provision for the early release of benefits subject to terms and conditions approved and determined by the Trustee relating to the provision of such benefit.

Financial Hardship Payment

Benefits will be paid to members on the grounds of financial hardship if they meet the following requirements

- has ceased employment,
- completes a 'Severe Financial Hardship Declaration' form,
- provides evidence in the form of a letter from Centrelink or Department of Veteran Affairs confirming that:
 - for members under age 55 and 39 weeks, a Commonwealth income payment is being received for at least 26 consecutive weeks,
 - for members over age 55 and 39 weeks, a Commonwealth income payment has been received for at least 26 cumulative weeks.
- completes a signed Statutory Declaration,
- completes an 'Application for payment of Benefits' form.

The amount that can be released is limited to a single lump sum payment in any 12 month period. The payment must be a minimum amount of \$1,000 before tax (except where the members benefit is less than \$1,000) and a maximum of \$10,000.

All claims over \$5000 are to be referred to Tasplan's Administration Committee for Decision. This is to ensure that the benefit payment does not exceed actual financial hardship claimed.

For members over age 55, there is no maximum payment.

The Fund Administrator has authority to pay the benefits after all conditions have been met.

Tasplan's Administration Committee will sign off benefit payments at subsequent Administration Committee meetings.

5. TASPLAN ADMINISTRATION

The assessment of Tasplan member applications is conducted by the Administration Committee on behalf of the Trustees. AAS collect and collate the information for presentation to the Administration Committee. The information is obtained via the "Application for the Release of Tasplan Benefit" which is completed by the claimant (Attached).

The process has become cumbersome, costly, time consuming and the validity of an increasing number of claims are being questioned. The principle and magnitude of claims has become such a concern, that Trustees need to give consideration to the continued provision of the benefit.

It has become evident that the number of claims has increased over the past two years which is impacting on the administration of Tasplan and the time imposed on Trustees in assessing such claims. (See attached statistics)

At the recent CMSF 2000 Conference, Senator Rod Kemp made it quite clear that the Superannuation Guarantee Contributions were for retirement income only.

Based on the actual claims received by Tasplan, indications are that some members are attempting to access their superannuation for immediate consumption. To fully assess the genuineness of a claim and the needs of the claimant is particularly complex and requires appropriate skills to be completely satisfied and comfortable with the final decision.

As Tasplan is not fully equipped with the skills necessary for assessment, and that assessments are made primarily on the written evidence provided by the claimant, it is difficult to fully understand the claimants actual situation without gathering additional information and the possible conduct of a personal interview. This would be very time consuming and costly.

Australian Administrative Services (AAS) estimate that the process of these claims currently represents approximately 15-20% of administration activity which is an intolerable situation.

6. SUMMARY

This discussion paper is to provide the Trustees with relevant information necessary to reconsider the provision of this benefit.

Obviously, it would be a difficult decision for the Board to cease the availability of these claims as a number of members with genuine claims would be disadvantaged. To withdraw access to a benefit that has been available to members for some time, would be difficult.

But given the increase in claimants, the time taken to process the claims, the lack of expertise available to properly assess the claims, the Board does need to reconsider its position. Most importantly, the benefits of other Tasplan members must be protected as they are, in effect, meeting Member Benefit Protection (MBP) costs.

The Board needs to take into consideration the problems and concerns that are associated with the provision of this benefit. Those identified are as follows:

- the fundamental principle of superannuation is undermined by the fact that members gain access to their accounts prior to retirement.
- the practice is open to abuse by members.
- it is having a major impact on administration in terms of cost and time. It is estimated that 15-20% of Tasplan administration activity is associated with the processing of Severe Financial Hardship Claims.
- the rule imposing a single lump sum payment in any 12 month period is not policed, especially if a person is a member of more than one superannuation fund.
- successful applicants receive the benefit with no interruption to their Commonwealth income support payment.
- the application and subsequent payment of some claims, is in effect clearing debt, which in turn, does not encourage savings. A reasonable number of claims appear as a result of mis-management of finances.
- Member Benefit Protection (MBP) is impacted when there is a small account balance remaining in the fund or if the member re-joins the fund at a later date. MBP is detrimental to other members of the fund.
- it is too convenient for Centrelink to "handpass" such cases to Superannuation Funds.

Should the Board decide to withdraw the benefit, members would need to be notified. Members could be notified via the Annual Report and be given three months notice of the Boards decision. Given that the Annual Report will be mailed in mid-October and possibly not received by members by the end of October, the effective date would be 1 February, 2001.

Ideally, an amendment of the Regulations rather than having to make the decision for Tasplan to withdraw the benefit, would be more preferable, but such an amendment could take some time to be effected.

The Board has three options available:

1. To retain the benefit for members indefinitely.
2. To withdraw the benefit with the earliest effective date of 1 February, 2001.
3. To delay a decision with a view to monitoring the progress of a possible amendment to the Regulations. This would overcome the situation of being seen as withdrawing the benefit. The decision would be taken out of the hands of the Trustees.

Neil Cassidy
General Manager
14 June, 2000

Application for the Release of Tasplan Benefit

FINANCIAL HARDSHIP – Benefit over \$5000

Definition of Financial Hardship:

In accordance with Regulation 6.01(5) of SIS, The trustee is satisfied that:

- i) based on written evidence provided by at least one Commonwealth department or agency responsible for administering a class of Commonwealth income support payments that:
 - a) the person has received Commonwealth income support for a continuous period of 26 weeks, and*
 - b) the person is in receipt of those payments at the date of the written evidence, and**
- ii) the person is unable to meet reasonable and immediate family living expenses*

Member Name: _____ Date of Birth: _____

Member Number: _____

Benefit member is seeking to have released: \$ _____

Account balance as at / / \$ _____

Date ceased working for Tasplan employer: _____

Centrelink letter received: _____

Summary of Financial Situation:

Total stipulated income per week (member and spouse): \$ _____

Total stipulated expenses per week: \$ _____

Total stipulated payments due: \$ _____

Statutory Declaration Received: _____

DECISION OF TRUSTEE

The Trustee has agreed to the release of benefits on the grounds of Severe Financial Hardship

Full amount requested

Other amount: \$ _____
(please specify)

Declined

Signed: _____ Dated: _____

Name: _____



**Tasplan
super**

Level 3 - 115 Collins Street
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Tel (03) 6233 1200 or 1800 005 166
Fax (03) 6233 1211

17 May, 2000

Miss Natalie Scott
12 Brushy Creek Road
Lenah Valley Tas 7008

Dear Miss Scott

Tasplan Superannuation Benefits – Membership No: 16165934

We refer to your recent request for the early release of your Tasplan superannuation benefits on the grounds of financial hardship, and enclose the following:

- Leaving the Service Advice (LSA).
- Financial Hardship Declaration.
- Superannuation quotation.

What You Need To Do

- Firstly, follow the enclosed Instructions about applying for early release due to severe financial hardship.
- Later, if you receive a letter from Centrelink/Veterans Affairs saying you qualify, send it to us, with your completed LSA and Hardship Declaration form.

Do You Need More Information Or Help?

We will be pleased to help you.
Please contact our Customer Service Centre on 1800 005 166 or (03) 6233 1200 if you require any further information or assistance.



Instructions

Background Information

To apply for superannuation benefits due to severe financial hardship you have to be:

- (i) receiving an appropriate Commonwealth Income Support payment from Centrelink or the Department of Veterans' Affairs, and
- (ii) have ceased employment with a Tasplan registered employer.

Check the following List of Payments to see if you qualify.

Centrelink Benefits (Allowances)

Enquiries: phone 13 2850 to obtain the letter

- widow allowance
- newstart allowance
- sickness allowance
- parenting allowance (other than parenting allowance that is paid at the basic rate independently of the spouse's income)
- youth allowance (provided it is not paid to someone undertaking full-time study)
- special benefit
- partner allowance
- mature age allowance granted after 1.7.1996

Centrelink Pension

Enquiries: phone 13 2300 to obtain the letter

- age pensions
- disability support payment
- wife pension
- carer pension
- sole parent pension
- mature age allowance (granted prior to 1 July 1996)
- mature age partner allowance
- bereavement allowance
- widow B pension
- disability wage supplement
- special needs pension

Service Pension

Enquiries phone 03 6221 6700

- age service pension
- invalidity service pension
- partner service pension
- carer service pension



Applicants under 55 and 39 weeks old must have received payments for a continuous period of 26 weeks. In addition, applicants must be able to provide evidence to the Trustee of an inability to meet "reasonable and immediate family living expenses".

Persons aged 55 years and 39 weeks or more, must be in receipt of payments for a cumulative period (not necessarily continuous) of 39 weeks after turning age 55 and not be gainfully employed on a full time or part time basis on the date of claim.

Only one payment a year can be made up to a maximum of \$10,000 (under 55 and 39 weeks old). There is no maximum once over this age.

The minimum release is \$1000, or if your account balance is below \$1000 the full amount can be paid if the Trustee permits.

If you believe you qualify, you need to ring the appropriate Department who will give you a letter. When you send that letter to us we will process your application, and issue you with your benefit cheque.

All claims over \$5000 are to be referred to Tasplan's Administration Committee for Decision. This is to ensure that the benefit payment does not exceed actual financial hardship claimed.

What you need to do if you qualify

1. Ring the **Department of Social Security** or the **Department of Veterans' Affairs** depending on the benefit you are receiving. (Phone numbers shown above.)
In due course, you will receive a letter from them.
2. Complete the Severe Financial Hardship Declaration and LSA form.
3. Within 21 days of the date of that letter -
Post that letter, the declaration and the completed Leaving the Service Advice to us.

Note: If we receive a letter older than 21 days we must reject it.

Early release of benefits on Compassionate Grounds

If you do not qualify for benefits on the above grounds, you may be eligible to benefits on compassionate grounds. These claims are assessed by the **Australian Prudential Regulation Authority (APRA)** against four strict criteria. An application form must be submitted to the APRA. If approved by the APRA, the request is then referred to the Trustee who will make the decision having regard to the governing rules of the fund.

Very briefly, the criteria relate to needing money for medical treatment for certain acute, chronic or severe conditions, to prevent foreclosure by a mortgagee on a home, to modify a home because of a severe medical disability, or for expenses associated with death, funeral and burial.

Enquiries, and for a copy of the application for benefit form, phone APRA on 13 10 60.



Severe Financial Hardship Declaration

The following information will be used solely for determining whether you are experiencing severe financial hardship. This completed form (or copy) will not be made available to any other person, (except under and order of a court).

Part A - Please answer all questions

GENERAL INFORMATION

Male _____ Female _____ (tick one)

Miss/Mrs/Ms/Mr _____ (circle preferred title)

Q1. Your surname _____ First given name _____

Q2. Your address No. and Street _____

Suburb _____ State _____ Postcode _____

Q3. Your daytime contact telephone number (if available () _____

Q4. Date of birth Day _____ Month _____ Year _____

Q5. List the number of your financial dependants
(eg, your partner and any children) _____

Q6. List the ages of your dependants _____

Q7. Please explain briefly the cause(s) of your financial hardship and how the money will be used if released:



Severe Financial Hardship Declaration

Part A

GENERAL INFORMATION

- Q8. What amount do you estimate would relieve your current severe financial hardship? \$ _____ (net)
- Q9. Current total NET weekly income Self \$ _____
- Partner \$ _____
- Dependants \$ _____

Q10. List the main current weekly expenses in relation to you, your partner and your dependants. (Specify items and amounts.)

Q11. List any current payments/debts due as at the date of this application. (Specify items and amounts.)



STATUTORY DECLARATION

To the Trustee of:

Tasplan Super.

I, _____ (full name)

of _____ (address)

DO SOLEMNLY AND SINCERELY DECLARE that:

the information provided in the Application annexed to the Statutory Declaration and marked with the letter "A" is true and correct.

I am unable to meet reasonable and immediate family living expenses, and that I do not have any assets (apart from my home) which could (reasonably and realistically speaking) be used or sold to cover this gap.

The amount I am requesting to be released is \$ _____ (net) necessary to meet reasonable and immediate family expenses as provided in the attached application.

And I make this solemn declaration by virtue of the Statutory declaration Act 1959, and subject to the penalties provided by that Act for the making of false statements in statutory declarations, conscientiously believing the statements contained in this declaration to be true in every particular.

TAKEN AND DECLARED BEFORE ME AT

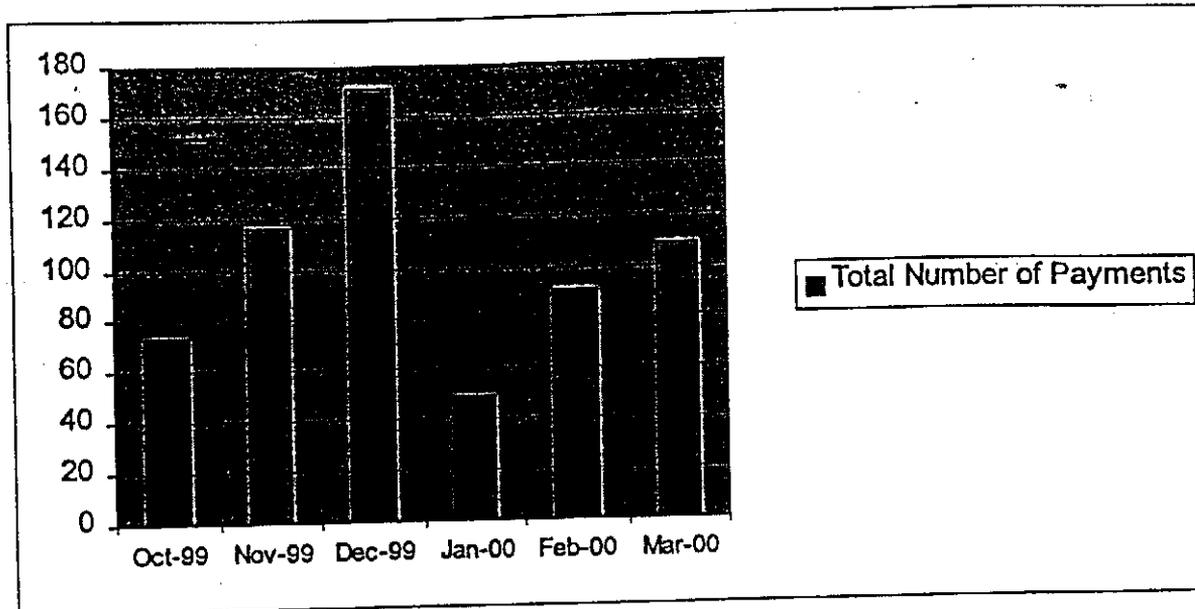
_____ this _____ day of _____ 2000

(Member's signature)

before me

(To be signed before a Justice of the Peace, Magistrate, Commissioner for taking Affidavits or Declarations, or Notary Public.)

SECTION 17 FINANCIAL HARDSHIP CLAIMS



Month Ended	Benefits Paid (\$)	Number of Payments
31/03/00	175,023	108
28/02/00	161,126	91
31/01/00	80,168	49
31/12/99	310,982	171
30/11/99	255,408	116
31/10/99	186,928	73
TOTAL	1,169,636	608

Definition of Financial Hardship

In accordance with Regulation 6.01(5) of SIS, the Trustee is satisfied that:

- i) based on written evidence provided by at least one Commonwealth department or agency responsible for administering a class of Commonwealth income support payments that:
 - a) the person has received Commonwealth income support for a continuous period of 26 weeks; and
 - b) the person is in receipt of those payments at the date of the written evidence,
 and;
- ii) the person is unable to meet reasonable and immediate family living expenses.



SECTION 16 BENEFIT PAYMENTS

Type of Benefit	Quarter Ended:											
	31/03/00		30/12/99		30/09/99		30/06/99		30/03/99		31/03/99	
	No	Amount \$	No	Amount \$	No	Amount \$	No	Amount \$	No	Amount \$	No	Amount \$
Disablement	11	155,905	14	129,971	21	346,853.45	27	402,150.43	15	243,636.37		
Death	14	223,365	18	287,463	6	76,759.39	21	293,633.83	10	125,503.97		
Financial Hardship	246	416,318	360	753,320	258	568,390.51	303	519,090.26	255	434,818.07		
Merge Members	33	26,697	32	31,236	25	9,501.42	72	82,223.51	51	56,146.34		
Retirement	95	503,586	124	334,654	113	587,827.50	141	323,846.78	77	408,522.38		
Rollover	796	2,743,875	1,025	2,668,802	1,121	3,549,621.82	812	2,037,672.93	730	2,229,762.97		
Transfer Out	101	618,488	98	849,162	212	1,543,201.80	91	513,766.04	65	319,235.09		
Unclaimed Benefits	0	0	8	12,562	0	0	0	0	0	0		
Unrestricted Benefits	21	107,794	36	107,754	20	54,386.67	0	0	0	0		
TOTAL	1,319	4,796,026	1,715	5,114,924	1,776	6,736,542.56	1,467	4,172,388.78	1,208	3,817,625.19		