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SBR Service Desk  
Standard business Reporting  
Australian Taxation Office  
Email: [sbrservicedesk@sbr.gov.au](mailto:sbrservicedesk@sbr.gov.au)

Dear Sir/Madam,

**ATO SUPER TAX FILE NUMBER INTEGRITY CHECK (STIC)  
MESSAGE IMPLEMENTATION GUIDE (MIG)**

Thank you for the opportunity to comment on the draft MIG with respect to the ATO's super tax file number integrity check service.

The Association of Superannuation Funds of Australia (ASFA) recognises the benefits that the STIC service will provide to the superannuation industry and to members of superannuation funds.

We have reviewed the draft MIG and in summary our main areas of concern are

- Inconsistencies with other SuperStream MIGS
- Lack of data to effectively update SuperSeeker
- Concern around the business impact on resolving cases where there is a 'not valid' response, and
- Timing to receive the final version of the MIG.

**About ASFA**

ASFA is a non-profit, non-political national organisation whose mission is to protect, promote and advance the interests of Australia's superannuation funds, their trustees and their members. We focus on the issues that affect the entire superannuation industry. Our membership, which includes corporate, public sector, industry and retail superannuation funds, plus self-managed superannuation funds (SMSFs) and small APRA funds through its service provider membership, represent over 90% of the 12 million Australians with superannuation.

**SPECIFIC COMMENTS**

**Section 1.5 - Issues**

**ID 1**

While it is understood that there may be some components of the MIG that final solutions have not been defined yet, ASFA consider that the delay in providing the necessary detail is unhelpful and will impact on industry's ability to deliver a solution to comply with the expectations for use of the service by the defined implementation dates.

## **ID 2**

The introduction of separate fields for Day of Birth, Month of Birth and Year of Birth is not currently supported by the SBR Taxonomy and it is inconsistent with the Rollover and Contribution MIGS.

ASFA's understanding of the purpose behind using SBR and its taxonomy was to ensure there was a standard way of defining data elements. The proposal that within SBR a person's date of birth can be presented as a single field (ddmmyyyy) or split into three components (day, month and year) would appear to be inconsistent with the higher level SBR goal and will generate an overhead on funds.

### **Section 2.2.1 - Successful Requests**

This section deals with the three possible responses to a request and sets out what each response means and the expected action by the fund.

ASFA's understanding is that a 'Not Valid' response will be generated when the data provided by a Fund does not match with confidence against the data held by the ATO.

The MIG states that the 'superannuation provider will need to resolve issues with their Members using their own business processes'.

ASFA has the following concerns with this statement:

- There are no existing business processes for this type of issue.
- The service does not provide any details on what data elements do not match for the TFN.
- There is an assumption that the error is with the fund's and not the ATO's data

ASFA requests that the MIG be expanded to:

- Explain that the error has arisen due to an inconsistency between the fund and the ATO data
- Explain that the error may lie with either the fund or the ATO data
- Provide information on the ATO process that the member may use to correct the ATO data where it is the ATO data which is in error. Funds will need this information so they can advise their members in appropriate cases.

As the MIG states that no record will be created on SuperSeeker without a 'valid' response applying to the record this increases the importance of having a streamlined process for identifying where the data issue lies, for it to be promptly corrected and for the record to be revalidated.

### **Section 4 - XBRL Context Specifications**

Although not a significant issue, we note that the context rules contain the full technical definition of the validation rules specifically for developers while the Rollover and Contribution MIGS have only contained the plain business definition of the Rules. This difference makes the Rollover and Contribution MIGS clearer and easier for a Business Analyst to read and understand.

The majority of the Instructions/Rules are defined only with the full Technical definition. As no business definition version has been completed it increases the risk of misunderstanding of the expectations. This is particularly so as the superannuation industry only has limited experience with SBR. By way of example even simple rules like if an element is Mandatory or optional is documented for all elements in the Rollover and Contributions MIGS but is not clearly defined for each element in this MIG.

ASFA considers that having the instructions defined in a single standard method across this and the rollover and contributions MIGs would have been preferable.

### **Section 5.4.2.3 - Super Fund Member Details**

This section deals with the data items that need to be supplied for the individual whose TFN is being

validated. It notes that the ABN of the requesting provider must be included in the SuperFundMember.{ReportingPartyABN} context instance.

Given that when a valid response has been achieved a Member record will be created by the ATO on SuperSeeker, we would have expected to find the Funds USI for the product that the Member is in included in the message. That is, ASFA's expectation is that more than just the Fund's ABN would be required to create an effective SuperSeeker record for the Member. Clarification of this matter would be appreciated.

**Seq. No. 3**

Day of Birth is a stand-alone field. This is a different standard to the Rollover and Contribution MIGS

**Seq. No. 4**

Month of Birth is a stand-alone field. This is a different standard to the Rollover and Contribution MIGS

**Seq. No. 5**

Year of Birth is a stand-alone field. This is a different standard to the Rollover and Contribution MIGS

**Seq. No. 9 - 14**

The address standards appear to be different to the Rollover and Contribution MIGS as follows:

- It only contains address lines 1 and 2 instead of 4 lines for address.
- The standard for reporting overseas addresses is different, where previously lines 3 and 4 were used.
- Locality is mandatory in other MIGS but optional in this MIG
- State element in other MIGS/Taxonomy contains AAT where this does not. Not this is an issue about consistency.
- Country Code mandatory in other MIGS but optional in this MIG

The major concerns with the address is:

- If address line 1 contains c/o, etc. then it will return an error message. This could be quite prevalent in the superannuation industry.
- Address lines 1 & 2 have a limit of 38 characters whilst the Rollover and Contribution MIGS (taxonomy) allow for 50 Characters. This would mean that funds can create a new Member record via the new standard with up to 50 Characters in their address but then receive an error when attempting to call the Super TIC service.

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If you have any queries or comments regarding the contents of our submission, please contact Robert Hodge on (02) 8079 0806 or via e-mail [rhodge@superannuation.asn.au](mailto:rhodge@superannuation.asn.au).

Yours sincerely



Fiona Galbraith  
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