



# Cortell Australia Pty Ltd



## CoreBIS APRA Solution



Customer Advisory Board (CAB) Meeting: 1  
2019 Quarter 4



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## Statement of Confidentiality

The information contained in this document is confidential to CAB participants and Cortell Australia. The document may not be disclosed, duplicated, or used for any purpose, in whole or part, without the prior written consent of CAB participants or Cortell Australia.

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Commercial – in – Confidence

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## 2. Terms of Engagement for CAB

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### 2.1 CAB Context

The **CoreBIS** Customer Advisory Board (CAB) has been established to ensure the **CoreBIS** platform provides its users with the best features and functionality possible to achieve their regulatory deliverables.

CAB will provide a forum where member improvement ideas can be tabled, shared, and agreed upon in a collaborative environment before moving forward into development and release into their respective production environment.

The CAB will also provide an opportunity to openly discuss regulatory changes impacting the industry and any relevant flow on effects that will impact CAB members and CoreBIS.

It is expected the CAB forum will provide valuable input into its members internal and external audit processes, and support their own internal risk management processes. In addition, CAB documentation can support supervisory reviews and/or site visits from APRA.

### 2.2 CAB Meetings

Meetings to be held once per quarter, in the month leading into Quarter end, on a date as agreed by consensus with members

- A quorum of two members is required for voting, with a majority required before moving forward with any feature enhancements or development initiatives
- Members are welcome to have more than one attendee at the meetings; however only one vote is permitted per member client
- Cortell will take notes and distribute minutes of meetings to each member

### 3. CoreBIS feedback

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- Better Training material!!!!

## 4. Communication / Period End Processes / Change Management

### 4.1 Considerations for Period End

- Taxonomy changes
- Internal Data model changes
- Rollover process / Version Locking
- Communication / SLA's

Taxonomy release 14 November 2019				
Form	Summary of taxonomy change	Summary of D2A form start date	New of changed form start date	Taxonomy effective date
ARF_112_1A	Taxonomy correction: Dimension member DV4280 business definition changed from '...remaining term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 3.2. Claims (other than equity) on ADIs & overseas banks, being claims with an original maturity of three months or less.	No change		20/02/2020
ARF_112_2A	Taxonomy enhancement: The dimension Capital Adequacy Approach Dimension DM418, Standardised DV5042 is removed from each line item and applied as a form level dimension.	No change		20/02/2020
ARF_113_3A	Taxonomy correction:	No change		20/02/2020
ARF_113_3B	Missing dimension Counterparty Default Status Dimension DM377, Not Defaulted DV4039 added to Section A: On-balance sheet risk-weighted assets and expected loss amount and Section B: Off-balance sheet risk-weighted assets and expected loss amount, column 5 Weighted average LGD % and column 6 Weighted average PD %			
ARF_113_3C				
ARF_113_3D				
ARF_180_1	Taxonomy enhancement: The dimension Capital Adequacy Approach Dimension DM418, Standardised DV5042 is removed from each line item and applied as a form level dimension.	No change		20/02/2020
ARF_180_2	Taxonomy correction: Missing dimension Balance Type Dimension DM355, RWA DV4530 applied to item 1 column 16 CS26743 and item 3 column 14 CS26767.	No change		20/02/2020
ARF_199_0	Taxonomy correction: Dimension member DV4284 business definition changed from '...relevant term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 6.5. Short term borrowings BSL10917. Dimension member DV4206 business definition changed from '...remaining term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 6.6. Long term borrowings BSL10931.	No change		20/02/2020
ARF_210_2	Taxonomy correction: Dimension members DV4205 and DV4206 business definition changed from '...remaining term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 5. Bank bills, certificates of deposit and debt securities issued by ADIs, BSAO16004, BSAO16005 and BSAO24226.	No change		20/02/2020
ARF_721_0B	Taxonomy correction: Dimension members DV8568, DV8569 and DV8563 business definition changed from '...remaining term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 2. Rates on repos and reverse repos outstanding, column 3 Repo original maturity OI14321.	No change		20/02/2020
ARF_743_0	Taxonomy correction: Missing dimension applied to items 6 and 7 Asset Quality Dimension DM401, Not Past Due 90D And Or Impaired DV4383.	No change		20/02/2020
ARF_747_0A	Taxonomy correction:	No change		20/02/2020
ARF_747_0B	Dimension members DV4273, DV4274, DV4275, DV4276, and DV4279 business definition changed from '...remaining term to maturity...' to '...term to maturity...' to align with the definition for Original Term To Maturity dimension DM434. Applied to item 5. New fixed-term deposits in the month - by counterparty & original term, column 2 Original term OI14298.	No change		20/02/2020

## Taxonomy release 15 August 2019

Form	Summary of taxonomy change	Summary of D2A form start date	New of changed form start date	Taxonomy effective date
ARF_742_OA ARF_742_OB	Taxonomy correction: For clarification, report level guidance 'If applicable, for bill acceptances only, this is the amount repayable by the borrower' added to Assets Loans And Receivables Credit Outstanding Amount DE14845	No change		14/11/2019
ARF_744_OA ARF_744_OB	The datatype of Assets Loans And Receivables Weighted Average Residual Term Number DE15105 changed from nonNegativeIntegerItemType to decimalItemType to allow for reporting to two decimal places. Item 6, column 6 BSAO29534 and Item 6, column 10 BSAO29538. Taxonomy correction: New concept Assets Loans And Receivables Weighted Average Residual Term Fixed Rate Period Number replaces DE15105 Assets Loans And Receivables Weighted Average Residual Term Number, table 5 columns 6 BSAO29542 and 10 BSAO29546	No change		14/11/2019
ARF_745_0	Taxonomy correction: Missing dimension applied to items 2.1 and 2.1.1. Activity Status Dimension DM888, New DV8223.	No change		14/11/2019
ARF_747_OA ARF_747_OB	Taxonomy correction: Missing dimension applied to items 1.1.1, 1.1.2 and 1.1.3. Standard Economic Sector Classifications Of Australia Dimension DM906, Resident Households DV8584 for item 1.1.1 and 1.1.2, Resident Non Related Non Financial Businesses Community Service Organisations DV8588 for item 1.1.3  The datatype of Assets Loans And Receivables Weighted Average Residual Term Number DE15105 changed from nonNegativeIntegerItemType to decimalItemType to allow for reporting to two decimal places. Item 4, column 6 BSL22540.  Dimension member DV8425 Non Financial Businesses Community Service Organisations changed to DV8588 Resident Non Related Non Financial Businesses Community Service Organisations in item 3.2.1 BSL22534, BSL22535, BSL22536 to qualify the counterparty as resident and non-related, consistent with the drop down list in table 3 column 1  Revised modelling for item 1.1.1. to reconcile with ARF_720_2 item 1.1.1.1. Replaced Account Type Dimension DM914 with Deposit Account Type Dimension DM959 and replaced Finance Purpose Dimension DM908 with Linked Deposit Purpose Dimension DM919.	No change		14/11/2019
ARF_748_OA	Taxonomy correction: Missing dimension added to item 6. Hedging Basis Dimension DM376, dimension member Hedged DV4229 .  The datatype and classword of Financial Risk Market Weighted Average Tenor Percent DE15106 changed to decimalItemType and Number to better reflect the unit of measurement being years (number of days from issuance to maturity / 365 days). Item 1.2, 1.3, 1.4, 2.2, 2.3 and 2.4 column 6 BSL22727, BSL22728, BSL22729, BSL22730, BSL22731, BSL22732.	No change		14/11/2019
ARF_748_OB	Taxonomy correction: The datatype and classword of Financial Risk Market Weighted Average Tenor Percent DE15106 changed to decimalItemType and Number to better reflect the unit of measurement being years (number of days from issuance to maturity / 365 days). Item 1.2, 1.3, 1.4, 2.2, 2.3 and 2.4 column 6 BSL22727, BSL22728, BSL22729, BSL22730, BSL22731, BSL22732.	No change		14/11/2019



## 4.2 Proposal:

TIME	WHO	ACTION
Work Day minus 1	Cortell	Email notification of taxonomy changes and production updates finalized
	Cortell	Market Share information updated

## 5. Regulatory Changes

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Open Consultations for the period requiring consideration:

### 5.1 Capital Requirements for First Home Loan Deposit Scheme Mortgages

APRA proposes to allow ADIs to treat eligible FHLDS loans in a comparable manner to mortgages with a loan-to-valuation ratio of 80 per cent. This would allow eligible FHLDS loans to be risk-weighted at 35 per cent under APRA's current capital requirements. Once the Government guarantee ceases to apply to eligible loans, ADIs would revert to applying the relevant risk weights as set out in APS 112.

### 5.2 Revisions to Prudential Standard APS111 Capital Adequacy: Measurement of Capital

APS111 is under its first review in 6 years. The primary intent is to align to the changes being made out of Basel. The three key changes here are:

- banks' equity investments in funds,
- banks' holdings of Total Loss Absorbing Capacity (TLAC) instruments
- capital arbitrage transactions

It is not envisioned any of these points will impact CAB members nor CoreBIS.

### 5.3 Consultation on Revisions to the capital Framework for ADI's

The majority of the capital points are still under consideration, however in the round 3 release APRA have released the draft APS117. The key point for consideration:

"While APRA does not propose to extend a capital requirement to these ADIs, APRA does propose to extend the application of risk management requirements within APS 117 to all ADIs, so that each ADI must have a framework for managing IRRBB."

Summary points are primarily qualitative, and it is not envisioned any changes will be required for CoreBIS.

Summary points:

#### 5.3.1 Responsibilities of Board and Senior Management for IRRBB Framework

No Change

#### 5.3.2 New Products

APRA proposes to introduce a new requirement that ADIs must assess and understand new products, instrument types and activities prior to their implementation. In doing so, an ADI must have developed adequate procedures and risk controls systems.

#### 5.3.3 IRRBB measurement system

APRA proposes to revise its documentation requirements for the IRRBB measurement system to explicitly require the documentation of data sources and capture methods, calculation method and

assumptions, including behavioural and other assumptions about the timing of cash flows and the rationale for the calculation method and all assumptions

#### 5.3.4 Internal reporting

APRA proposes to substantially retain the internal management reporting requirements ie reporting hedging strategies and management outcomes to the board regularly.

#### 5.3.5 Stress Testing

APRA expects that a standardised ADI stress testing and scenario analysis for IRRBB would meet the requirements in *Prudential Standard APS 110 Capital Adequacy*. Under CPS 220, APRA requires the stress testing program of an ADI to be commensurate with the size, business mix and complexity of the ADI. That is, an ADI's stress testing program for IRRBB is commensurate with the nature and level of its IRRBB exposure.

#### 5.3.6 Independent management function

No real change (some simplification)

#### 5.3.7 Independent review of the IRRBB management framework

No change

#### 5.3.8 Identifying outliers

APRA's current criteria for identifying outliers is 20 per cent of Tier 1 based on 200 basis point parallel shocks. APRA proposes to adopt the Basel test for identifying outlier ADIs. APRA will consider a standardised ADI or a IRB ADI to be an outlier where the maximum change in economic value of equity under the six interest rate scenarios prescribed in the April 2016 Basel standard exceeds 15 per cent of its Tier 1 capital. APRA proposes that the test applies to all standardised and IRB ADIs but will estimate this for smaller standardised ADIs based on data collected under a revised ARS 117.0.

Where an ADI is determined to be an outlier, APRA will be able to require an ADI to decrease its level of IRRBB or increase its capital if the capital held is not commensurate with its risk profile. For a standardised ADI, this means that APRA may require it to hold capital for IRRBB.

## 5.4 Proposed changes to Due Dates of ADI Quarterly Reporting

No impact for CoreBIS

APRA is proposing that the due dates of all Quarterly reporting forms be standardised to 35 calendar days after the quarter end.

## **5.5 Consultation on Remuneration Requirements for all APRA regulated entities**

Draft Prudential Standard CPS 511 Remuneration is qualitative in nature and will not impact CoreBIS.

## **5.6 5.6 EFS 743**

BB to submit EFS743 on quarterly basis via spreadsheet

## 6. DCS Updates

### Key Points:

- Go Live date to be confirmed early 2020
- Test environment available mid-2020. Minimum 3 months is being given for testing
- MyGov ID to be setup for individuals to replace Aus-key
- Access to D2A post March 2020 is being worked on with APRA and ATO
- Transition plan to be agreed between Cortell and CAB members
- Manual Data entry only allows for single cell copy and paste functionality, consideration to be given

### 6.1 Entity Checklist

ENTITY CHECKLIST	COMMENTS
<p><b>Phase 1 - Mobilisation</b>            Entities are expected to:</p> <ul style="list-style-type: none"> <li>Plan and allocate resources to facilitate the transition to the new solution (if required)</li> <li>View a recording of the webinar on the new solution</li> <li>Encourage users to register for myGovID</li> </ul> <p>Provide Principal User details to APRA to access the test environment (process to be communicated at a later date)</p> <p>Provide information on data submission practices via the adhoc D2A form (available 1-30 August 2019)</p> <p>Provide additional entity contacts for all individuals who should receive communications about the new solution</p> <p>Read the supporting material to build knowledge of the test environment</p> <p>Review sample XML and XBRL forms to align to the new solution</p>	<p>Cortell resources to test API's and taxonomy changes in new solution            Complete</p> <p>There will be no organisation myGovID. A unique myGovID is required for you to form an individual digital identity, this will remain personal to you. Once you have gained your individual identity, you can then link yourself to your organisation via RAM which allows you to act on behalf of a business with participating government online services.</p> <p>Has this been delivered by BA and BB?</p> <p>Cortell is registered, up to BA and BB whether they chose to</p> <p>To be completed</p> <p>To be completed</p>
<p><b>Phase 2 - Testing and familiarisation</b>            Entities are expected to:</p> <ul style="list-style-type: none"> <li>Log into the test environment using myGovID authentication</li> <li>Leverage reference guides for submission processes in the test environment</li> <li>Provide feedback on issues and solution improvements</li> </ul>	<p>To be completed</p> <p>To be completed</p> <p>To be completed</p>
<p><b>Phase 3 - Pre go-live</b>            Entities are expected to:</p> <ul style="list-style-type: none"> <li>Complete end-user training</li> <li>Perform parallel testing: replicate D2A submission in the test environment prior to go-live</li> <li>Review readiness checklist to ensure all activities have been completed prior to go-live</li> <li>Validate or update the Principal Users in preparation for go-live</li> </ul>	<p>To be completed</p> <p>Cortell to work with customers to ensure parallel submission aligns to APRA requirements</p> <p>To be completed</p> <p>To be completed</p>
<p><b>Phase 4 - Go-live and onwards</b>            Entities are expected to:</p> <ul style="list-style-type: none"> <li>Authenticate via myGovID and log into the new solution</li> <li>Submit returns and fulfil reporting obligations</li> <li>Provide feedback on issues and solution improvements</li> </ul>	<p>To be completed</p> <p>To be completed</p> <p>To be completed</p>

## 6.2 Testing and Training

TEST AND TRAINING CHECKLIST	CORTELL COMMENTS
<p><b>Proposed functionality (first test release)</b>            User authentication            Data submission (Manual, XML and XBRL)            Homepage and solution notifications (non-email notifications)            Resubmissions (without historical data)            Adhoc returns</p> <p><b>Proposed returns (first test release)</b>            720 series of returns are the first test release</p> <p><b>Entities are encouraged to develop their own test cases</b>            The test environment will allow entities to trial the new solution prior to go-live. Entities have the flexibility to test the functionality and returns that are most relevant to them. APRA will provide guidelines for testing and expects entities to develop relevant test cases.</p> <p><b>Training and support</b>            APRA will provide access to training and support materials to help entities, Service Providers and RegTechs use the new Data Collection Solution. Users will require training at two key milestones during the implementation:            prior to the release of the test environment            prior to go-live</p> <p><b>Training modules</b>            APRA recognises that entities' interactions with the new solution will differ based on varying organisational processes and roles as well as the submission channel and format (e.g. manual entry, file upload, outsourcing to a service provider). As a result, training will be developed and delivered in modular packages. Modular training will enable users to easily access relevant content and only complete the minimum required learning for their role. APRA plans to develop the following training modules:</p> <p>Proposed modules            Authentication using myGovID            Solution navigation            User administration and access management            Submission via manual entry            Submission via file upload            Use of API for submissions            Resubmissions            Requests and supporting information</p>	<p>Cortell and Customers to test            Cortell to test</p> <p>Cortell and Customers to test (Cortell will consider interfaces between DCS and CoreBIS)            Cortell            Cortell</p> <p>Ok</p> <p>Cortell will design the test cases to share with the CAB</p> <p>Dates to be confirmed            Dates to be confirmed</p> <p>Training outcome            To understand how users can set up their authentication credentials (leveraging ATO materials)            To understand the functions available in the solution including notifications and how to navigate around the solution            To understand how to set up users in the solution, assign appropriate user roles and manager user access            To understand the process for drafting and submitting returns via manual entry including responding to validation messages            To understand the process for drafting and submitting returns via XML and XBRL file uploads including responding to validation messages            To understand the API capabilities in place and how to utilise them            To understand the process for resubmitting returns            To understand how to submit requests to APRA and provide supporting information</p>

## 7. Roadmap Developments

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### 7.1 Development Guidelines

- Member(s) to present idea's on what enhancements are desired
- Members agree which enhancements they would like for CoreBIS including any prioritization of enhancements
- Cortell to review enhancements and communicate to group members estimated time to complete each enhancement
- Upon agreement from members, Cortell to commence development aligned to prioritized list
- Cortell to present back to members an update on the changes
- Each member to give their approval before Cortell migrates change into production for each client

### 7.2 Development Roadmap

TBC

## 8. Any Other Business

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## 9. Minutes:

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### 9.1 Agenda

All – agenda seems sensible

### 9.2 Terms of Engagement

All – makes sense the purpose of the CAB.

JC – all participants welcome to add to or suggest changes to purpose

### 9.3 CoreBIS Feedback

KM – internal audit is going to be conducting a review into the system and reporting processes in Qtr 1 2020, Kerri has concerns if we do not have user guides then there will be some adverse outcomes identified

RS – echoes sentiment and commented that external audit will be conducting their review in Qtr 1 2020

MH – suggested user guides would be of great benefit, for those less frequent activities, but also given they will have new users coming onto the system then the user guides will benefit these people as well for basic functionality. MH suggested a phased approach to deliver user guides, commencing with:

- End of month rollover
- Table mapping

KM – added third point being Perspectives e.g. when they delivered work in Dev within perspectives, they were not always 100% sure whether the work had been transitioned to Production

JC – Action item for Cortell to deliver User guides for Qtr 1 2020

TB – raised the challenge of tagging the old and new Forms (330 & 730) from the one cube e.g. some GL's were required on one Form but not another.

MH – BA need to do their EFS forms in CoreBIS

KM – commented she has a few items to call out:

- the bank had challenges with the name change from 1/7/19, specifically when it came to resubmit the 30<sup>th</sup> June Forms, KM wanted to able it for Cortell's awareness. KB to investigate possibilities
- the validations rules do not appear to be working correctly for BB
- the derivation rules on some of the latest Forms are not working correctly
- ARF747 does not export the average interest rates correctly

TB - 112\_2A section B has disappeared (new Form)

RS – this is the new Form ARF180

KB – is aware of the issue on derivation rules, is working on resolving the issue. Derivation rule fields are ultimately not submitted to D2A so it should not prevent submission, however issue needs resolution

MH – some challenges experienced when running previous Form versions

RS – should we setup a template in which we can list items/issues that are experienced and share within the CAB

MH – BA are currently not utilising the reporting capabilities in CoreBIS, they would like to start using these going forward for business unit meetings, finance reviews etc. They found using the reports like the trend analysis, it was not always displaying correctly, he understands this may be attributed to them not locking periods.

KM – BB are currently entering manual table entries direct into D2A and not CoreBIS e.g. large exposures, points of presence. Is there a way they can have a manual entry function for tables?

KB – yes if you go into the drill screen and select table adjustments here you can manually enter the data

KM – can we bring this to the front landing page

KB – yes if you would like

RS – it would be great to look at the reconciliation process e.g. they would like to see a rec between the GL and the sub forms, also the data reconciliation in CoreBIS was showing consistent differences between the base cube and tagged cube, both on absolute and count positions (although the absolute position has subsequently been resolved). Having consistent reconciliation differences negates the value of the report.

KB – the rec can be distorted by calculated fields, hence the custom reports section may be more appropriate to setup specific rec's required

MH – they complete downstream rec's of data flowing into the data mart, anything else we can reconcile in CoreBIS would be of benefit

KM – they currently complete a number of rec's in excel

JC – all such repetitive rec's should be automated, happy to look at this in further details to bring greater value to the process

KM – happy to send JC the recs they complete manually

## 9.4 Communication / Period End Process

All – everyone agreed communication to be delivered from Cortell on last day of month which provides all updates for the period e.g. taxonomy updates

## 9.5 Regulatory changes

RS – the new FHDLS will possibly require a new product approval, but still early days

MH – requires further guidance from APRA e.g. should it be treated with or without LMI?

KM &MH – happy with extensions to reported dates, but it may create issues with quarterly period flowing over the following month.

JC – does not believe there will be any impact on CoreBIS from the capital review work released by APRA pertaining to the 117. Unless there are changes the customer would like to stress testing and forecasting which planning analytics can deliver, most of the changes are qualitative in nature.

All - Also agreed the capital changes currently will most likely not have an impact on CoreBIS, rather some internal data reviews will be required.

KM – ARF743 excel template to be submitted quarterly. Whilst they are not in excess of the tolerance levels, there is discussion the tolerances will be taken down to a state-wide level as opposed to National, and BB may meet the tolerance thresholds in certain states. KM would like to see the Form completed in CoreBIS and exported to excel for sending through to APRA. BB may require some assistance from Cortell with this.

RS – asked whether CoreBIS customers can effect changes directly themselves, e.g. when a new product is introduced.

JC – yes this is the intent of CoreBIS that customers can be self-sufficient for change. It may require their BI teams to make the data available for ingestion but once in CoreBIS they should be able to go through the tagging and mapping directly themselves. Cortell is always here for support should it be required.

KM – commented likewise BB will have some new data shortly to be brought into CoreBIS

## **9.6 DCS updates**

All – agreed that there was not much more to do until further information is released by APRA which is expected early in 2020. There was discussion about a possible phased approach for the implementation of DCS, which APRA have communicated on their website they are considering.

JC – not sure how the interaction is going to work from Cortell employee MyGov ID's linked to client's environments for testing, will be guided by APRA when they release further information

MH – will this be required given Cortell currently do not access D2A through the aus-key?

KB – not sure, there will most likely be the need given certain API calls will be required against the clients instance

## **9.7 Roadmap Developments**

All – agreed focus on the user guides, bedding down the learnings and knowledge acquired to date to really start using the full functionality of CoreBIS is priority, then possible developments can be looked at going forward

RS – certain developments such as CUFFS would be of benefit and an easy solution update

## **9.8 Any Other Business**

All – nothing else to add

## 10. Action Items

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WHO	TIMELINE	ISSUE / ACTION
Cortell	Qtr 1 2020	User guides to be prepared
Cortell	Qtr 1 2020	Investigate issue of name change impacting the resubmissions
Cortell	Qtr 1 2020	Derivation rules on new Forms not always working
Cortell	Qtr 1 2020	Investigate specifics of old Form versions not working for BA
Cortell	Qtr 1 2020	Setup template for recording of issues/items that we can identify issues and or trends that require addressing
Cortell	On going	Email communication of changes for month to be sent last work day of month
KM	Qtr 1 2020	To advise whether Cortell assistance will be required for the 743 Form
Cortell / KM	Qtr 1 2020	Decide whether manual adjustments for table should be on the landing page
KM	Qtr 1 2020	Send JC the rec's they are completing manually in excel
Cortell	Qtr 1 2020	Investigate the reconciliation process to identify what needs to happen to bring additional value to the process