



Mr Matt Flavel
Deputy Secretary
Social Security
Department of Social Services

Dear Mr Flavel

Impact Analysis – Second Pass Final Assessment – Resolution Approach to Income Apportionment

Thank you for your letter of 26 August 2025 submitting an Impact Analysis (IA) for formal Second Pass Assessment. I note the IA has been formally certified at the Deputy Secretary level consistent with the *Australian Government Guide to Policy Impact Analysis* (the Guide).

I appreciate the Department of Social Services constructive engagement on the IA. The Office of Impact Analysis' (OIA) assessment is that the quality of the analysis is 'adequate'. The IA addresses the seven IA questions and follows an appropriate policy development process commensurate with the significance of the problem and magnitude of the proposed intervention. To be considered 'good practice' as per the Guide, the IA would have benefited from further detailed quantification of costs and benefits, further discussion of stakeholder feedback on the policy options and a more detailed evaluation plan.

The IA may now be provided to the decision-maker to inform their decision.

Nest steps

Ahead of the final decision being announced we would appreciate a copy of the IA in a form meeting the Government's web accessibility requirements. The OIA will then publish the IA, along with your certification, on the OIA's website at oia.pmc.gov.au. The IA must also be included in any Explanatory Memorandum or Statement giving effect to the proposals in the IA, as stipulated in the User Guide to the Australian Government Guide to Policy Impact Analysis.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, reading "Joanna Abhayaratna". The script is cursive and elegant, with the first letters of each word being capitalized and prominent.

Joanna Abhayaratna
Executive Director
The Office of Impact Analysis
28 August 2025