

## **Chapter 35 Department of Social and Family Affairs**

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### **The Money Advice and Budgeting Service**



## The Money Advice and Budgeting Service

35.1 The Money Advice and Budgeting Service (MABS) is provided by a network of companies with the Department having overall responsibility for the service. The service is provided by 51 local companies throughout the country.

35.2 In addition to the 51 companies, two further companies have national functions

- MABS National Development Ltd (MABS NDL) was established in 2004 to support staff and manage the service.
- National Traveller MABS was established in 2005<sup>98</sup> to provide specific support on issues relating to the traveller community.

At May 2009 there were 252 staff employed in all of the companies.

35.3 In October 2008, the Minister for Finance announced that the service would be assigned to the Citizens Information Board<sup>99</sup> (CIB), with the Department retaining overall policy and financial responsibility for MABS. The legislative basis for this change is set out in the Social Welfare (Miscellaneous Provisions) Act 2008.

35.4 Local MABS companies are established as companies limited by guarantee and are overseen by boards of directors. Membership of these boards is typically drawn from representatives of Credit Unions, the Society of St. Vincent de Paul (SVP), the Community Welfare Service of the Health Service Executive (HSE), resource centres for the unemployed, the Citizens Information Service of the CIB, Local Authorities and the Department.

35.5 The principal aim of the service is to provide a free, confidential and independent debt advice and management service mainly to low-income families who are already in debt or at risk of getting into debt. The MABS service involves

- providing information (around 13% of cases in 2008)
- helping to make arrangements with creditors (around 73% of cases in 2008)
- facilitating debt management (balance of cases).

35.6 Limited information was available on the service's client base prior to mid 2005. However, since then a new management information system has been put in place. Figure 116 records the level of client throughput for 2007 and 2008.

**Figure 116 Clients Dealt with in 2007 and 2008**

Year	New Clients	Information Only Cases
2007	12,433	2,643
2008	16,600	2,441

35.7 The cost of providing the service in 2008 was €16.22 million. Figure 117 details the financial allocations and the actual expenditure on the service for the period 2000 to 2008.

98 Its predecessor, Exchange House MABS, was established in 1995.

99 The Citizens Information Board is a statutory body operating under the aegis of the Department.

**Figure 117 Allocations and Expenditure for MABS, 2000 to 2008**

Year	Allocation	Expenditure
	€m	€m
2000	5.77	6.15
2001	8.47	8.28
2002	9.70	9.28
2003	9.87	9.41
2004	11.40	11.40
2005	13.62	13.59
2006	16.41	13.58
2007	17.67	14.58
2008	17.95	16.22

35.8 In 2008, the average expenditure of local companies was €278,322.

## Environment in which the Service Operates

35.9 Personal sector credit has been expanding. The Central Bank of Ireland has reported that by the end of 2006 personal sector credit reached 164% of disposable income compared to 70% in 1998<sup>100</sup>.

35.10 In its 2007 Financial Stability Report, the Central Bank reported that 6.5% of households who had mortgages experienced some form of financial stress in 2005 – a similar level to 2004 and 2003. At that time, failing to meet scheduled utility payments (4.3%) was the most common form of financial stress followed by falling into arrears on mortgage payments (3.8%). Single parent households were the most likely to experience financial stress, while households with the lowest incomes reported the highest level of financial stress.

35.11 The increasing resort to credit in recent years has resulted in households having high debt levels at a time when incomes are predicted to stagnate or fall and unemployment levels are increasing. The tightening of credit and aggressive pursuit of debt by financial institutions have resulted in increased demand for the service.

35.12 There were 222,800 persons unemployed in the first quarter of 2009, representing an increase of 113,400 (104%) over the same quarter in 2008<sup>101</sup>. Unemployment is predicted to increase further in the short-term.

## Organisation of the Service

35.13 Services are delivered through local companies. A benefit of this is the involvement of local voluntary groups and the fact that they remain close to the communities they serve.

35.14 The Department has overall responsibility for the management of the programme, including monitoring of MABS, the administration of the funding allocation, policy development and executive decision-making. A dedicated unit within the Department manages the service centrally. The network is further supported by the Department's officers based in regions. The Department

100 Central Bank Financial Stability Report 2007.

101 Central Statistics Office, Quarterly National Household Survey – January to March 2009.

has a representative on each local MABS board of management. In addition, Department regional coordinators support local MABS boards and the local companies themselves.

### ***Regional and National Structures***

In addition to the 51 local companies, the service also has regional and national structures.

- Departmental Regional Coordinators support local companies, chairing meetings with representatives from the companies in their areas four to five times a year.
- A Money Advice Training Unit operates within MABS ND. It supports staff and management countrywide, providing training services and a range of operational supports.
- Commencing in 2009, the CIB will formulate policy, make recommendations to the Department, and look at issues that affect users of the service and the local companies. Formerly, a National Advisory Committee (NAC) discharged this role.
- MABS ND provides technical advice and support in relation to specific case queries. It facilitates the development and delivery of community education programmes. In addition, support is provided for IT systems and the national telephone helpline.
- A National Executive of Money Advice Staff aims to promote professional standards among money advisors and administrators employed by the companies.
- A National Management Forum which is representative of the local management groups and its Executive Body consists of two representatives from each region.

35.15 Around 73% of clients receive support to deal with existing debt and to avoid its recurrence. A further 14% receive enhanced support, under which special accounts are operated in conjunction with credit unions. In these cases, clients enter into an agreement through which money advisors are authorised to manage their credit union accounts and make repayments to their creditors.

35.16 In addition, a Loan Guarantee Fund (LGF) is operated, to guarantee credit union loans to clients who do not meet normal credit union criteria. The money is advanced by the Department and lodged with credit unions as a reducing balance guarantee. It remains the property of the Department.

### ***The Loan Guarantee Fund***

The Fund predates the establishment of the MABS and was set up in 1989 as part of an action plan to deal with the problems of money lending. The Fund was made up of a contribution of €127,000 from National Lottery Funds and €127,000 from the Irish Banks Standing Committee and was initially managed by the SVP. The Department stated that it was established and continued to be used for MABS clients, as an alternative credit source to money lenders, who can charge interest rates of up to 188%.

Each MABS company places a LGF deposit with its local credit union. This is used to guarantee small loans where a client has a track record with MABS but an insufficient savings record to obtain a normal credit union loan. Amounts rarely exceed €500 and may occur in family emergencies. A client applies to the credit union for a loan in the normal way but is not informed that it has been guaranteed by the LGF. Before the credit union can have recourse to the LGF in respect of a default, it must have exhausted all normal recovery procedures.

The LGF operates outside the normal MABS procedures in assisting clients with debt management. At present there is €630,893 in the LGF, with 206 loans guaranteed to the extent of €143,920.

35.17 Clients are seen by MABS money advisors by appointment. Offices are not open to the public in the same way as a social welfare local office. Prospective clients phone their local service and they are given an appointment time or, alternatively, an appointment may be set up for them through a helpline. The helpline is available Monday to Friday from 9am to 8pm.

### **Audit Focus**

The audit reviewed whether the service as currently structured

- delivers its service efficiently
- reaches the target population (low-income families who are in debt or at risk of becoming so)
- has had its effectiveness assessed.

The proposed assignment of the service to the CIB provides an opportunity to address the current service model. The views of the Accounting Officer were also sought on the challenges that were involved in restructuring the service.

### **Efficiency of the Service**

35.18 Excluding clients seeking information only, the service dealt with 16,600 clients in 2008. This is an average rate of less than two per week per staff member. The cost of dealing with an average case was just less than €1,000.

35.19 There is no overall information on the time taken by clients to move through the system. None of the MABS companies visited were in a position to state how long it took to complete dealings with clients. While information is available on the numbers of clients served, the lack of information on the time devoted to the average case militates against evidence-based allocation of resources in individual companies and across the network.

35.20 A further indicator of service delivery is the length of time it takes to access the service. No formal targets have been set at national or local level. However, one company visited had set a guide time of two weeks.

35.21 No data on waiting times is maintained. Only one of the companies visited recorded client queries and appointments in such a way that waiting times could be calculated. In all cases clients are seen by appointment only.

A standardised system for recording client contacts at company level should be developed, under which information such as initial contact dates, appointment dates, non-attendance rates and client discharge dates are collected and reported, so that timely output and performance information can be generated and used.

### **Service Standards**

35.22 A Customer Service Charter has been in place since 2006 and is displayed in local offices. Having a charter is not in itself sufficient to guarantee performance; the commitments under the charter need to be monitored. In the area of client satisfaction, while comment cards had been introduced in 2007, none of the four companies visited had received a response to these cards. One of the companies visited indicated that it is working with MABS NDJ with the intention of performing a client survey.

35.23 Overall, there has been no assessment of client satisfaction. The Department has stated that a Quality Assurance Working Group was established in 2007 to examine service processes and develop appropriate standards. The focus is on developing governance capacity across the network. This includes the development of quality standards. A working group is examining the delivery of the service and is expected to report in mid-2009. It is intended to seek approval or certification for the quality standard from an appropriate third party. This will be followed by the development of appropriate training and the implementation of the standards across the network.

35.24 The effectiveness of board oversight is somewhat constrained by a strict interpretation of the confidentiality clause in the contracts between the Department and the companies. This has limited the capacity of boards to assess the quality of the service being provided to clients, since client files are not available to boards.

The work of the Quality Assurance Working Group needs to be prioritised so that specific service standards can be developed. Particular focus should be given to waiting times and client satisfaction levels. The Department should ensure procedures are introduced to standardise the data maintained.

### **Reaching the Target Population**

35.25 In order to effectively deliver on its mandate it would be necessary that

- the target population be aware of the services available
- a balance be achieved between preventative work and services for those already in debt
- a well-developed referral system exist linking organisations that service the same or similar client bases.

**Service Promotion**

35.26 The examination noted that approximately 1% of overall expenditure is used for service promotion. This is applied as part of seasonal and once-off campaigns.

35.27 At national level, a website was established in 2004. This provides information on debt management, a service location map, contact details for individual companies and outreach services<sup>102</sup> and information on the services available. None of the companies had their opening hours displayed on the website<sup>103</sup>. It is estimated that there have been approximately 320,000 visits to the site since its introduction. One of the companies has developed its own website, however its opening hours were not displayed on the site.

35.28 In September 2007, a national telephone helpline was established which provided advice and information to those who only required first line assistance. The helpline can now handle less complex single debt cases such as threatened utility disconnections. The helpline currently deals with over 18,000 calls per annum. Issues are said to have been resolved in over 90% of these cases. Helpline staff also refer callers to local companies where the issues are too complex to resolve.

35.29 Where waiting lists for appointments have built up at local level, calls are sometimes made to the helpline by those who are on the waiting lists. These clients are provided with preliminary information and advice, and are helped to prepare for meetings with money advisors, so that maximum value can be gained from the first consultation with their local service.

35.30 At local level, all of the companies visited placed promotional literature in prominent public places. They also informed the examination team that they rely on word-of-mouth as well as permanent advertisements in local newspapers, distributing leaflets prepared by MABS NDL and advertising the service on supermarket receipts in major shopping centres. All four companies visited expressed concern to the examination team that they may not be reaching the right target groups. However, only one of the companies undertook any formal evaluation of the effectiveness of its approaches.

35.31 The Department stated that there were no plans to implement an annual marketing programme in respect of the MABS at this time. However, the matter would be kept under review in the light of uptake of the service, the findings that emerged from research about access to assistance for people that have debt difficulties and the availability of resources. It stated that a number of initiatives were in hand to ensure that MABS remained prominent in the public eye. The communications officer in MABS NDL made regular contributions to the media on budgeting and money management. Until recently he had a regular weekly slot on RTE's 'The Afternoon Show'.

35.32 A radio campaign was undertaken to highlight the MABS national telephone helpline in January and March 2008. While the radio advertisements were playing there was a short-lived upsurge in calls but this was not sustained over a longer period. A series of regional meetings with the MABS key partners and the main referring organisations has proved more successful in raising awareness about the helpline and the services it can provide. It is also anticipated that the requirement to refer people in debt difficulty to the MABS included in the two statutory codes of practice for money lenders and for the banks in dealing with mortgage arrears will highlight awareness of, and increase referrals to, the MABS.

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102 Some of the MABS companies operate what are termed 'outreach services' in addition to the main full time services, where they provide the service, normally once a week, in a location different to the company office.

103 Waterford MABS provided opening hours for outreach centres, but not for its main office.

Under its Strategic Plan for 2008-2010, MABS NDL has an objective of raising awareness and increasing the use of the service.

### ***Preventing Debt Problems***

35.33 An important objective of the service is to educate citizens on how to avoid getting into debt. However, at present, there is no national community education strategy in place. MABS NDL informed the examination team that they plan to develop such a strategy.

35.34 An exception is the travelling community, where the National Traveller MABS company aims to address the problem of debt and access to affordable credit by encouraging clients to join credit unions or use banks, and by educating clients and groups in budgeting and money management. The employment of a full-time community education worker has facilitated the development of an educational strategy in this area.

35.35 Activity at company level is highly skewed in favour of case management of debt problems to the detriment of preventative actions. At company level, the examination found that while educational activity was not recorded precisely, estimates provided by the companies visited indicate something approaching 5% of staff time is devoted to it. This varies from company to company and in one case, this activity ceased in 2007 because staff were said to be too busy dealing with clients who had already fallen into debt.

35.36 The Department stated that it might be desirable to have solid research evidence that would help to determine the optimum level for educational activity. However, there were no proposals to undertake such research at this time. Dealing with clients who were in debt difficulty is the priority activity for all MABS services, but community education was an important part of local work programmes.

### ***Referral System***

35.37 The smooth referral of clients by other agencies is important in effectively targeting the population served. The examination team found that in general there were no agreed criteria for the referral of clients between companies and referring agencies. While companies recorded incoming referrals manually, no records were kept by two key agencies – the CIB or the HSE at local level.

35.38 The Department stated that MABS NDL is currently arranging meetings with the main referring and creditor organisations including banks, credit unions, citizens information and the SVP, to discuss with them the appropriate channels (helpline or appointments) for referring their clients to the MABS.

35.39 The main types of referrals to MABS companies were

- self-referral – 26% in 2008 (27% in 2007)
- family/friend – 20% in 2008 (18% in 2007)
- HSE Community Welfare Officers (CWOs) – 11% 11% in 2007 and 2008.

35.40 A significant proportion of clients were referred onwards by the local companies – 30% in 2008 (32% in 2007). These referrals generally arose where different problems were identified during the course of engagement with staff, such as gambling or substance abuse.

## **Service Effectiveness**

35.41 For the service to function effectively, it would need to communicate a clear vision of its purpose, establish performance reporting and set up mechanisms for evaluating its effectiveness.

### ***Service Objectives***

35.42 At local level, each company has a three-year contract with the Department, which covers funding and service delivery commitments. As part of the contract process, each company submits a three-year strategic action plan grounded in the MABS high-level objectives, and a progress report outlining achievements in respect of the previous plan. Each company submits an annual report outlining its achievements under its action plan.

35.43 The service has never had an overall national strategy. The Department did identify the high-level policy objectives when the service was established in 1992 and the objectives have remained the same since.

35.44 The Department stated that MABS was a highly valued service with committed voluntary boards of management and staff. However, it recognised that further improvements could be made in the operational structure, in relation to leadership and overall coordinated management of the network of services. The Department had developed policy and legislative proposals in recent years to address these matters, and to deliver on commitments in the programme for Government to put in place a new structure for MABS, with strong national leadership and the continued involvement of the voluntary sector. The CIB was preparing a new strategic plan in relation to its activities for 2009 to 2011 and that plan would encompass MABS activities.

### ***Management Information***

35.45 Since 2005, MABS NDL has collected data from individual companies and produces client statistics for the Department. Currently, it can provide national statistical information on the

- number of new clients monthly, quarterly and annually
- category of clients, including age, gender and accommodation
- clients' income status
- source of referrals to and from MABS
- amount of new client debt
- special accounts.

35.46 Overall the type of data provided is mainly demographic information and does not extend to operational costs, staffing levels, client waiting times or throughput statistics. The consistency of the information is questionable, in that, at local level the examination found four different methods of categorising repeat clients in companies visited.

Data relating to the number of clients should be accurate and compiled in a standard fashion. The lack of a common approach to categorising and recording clients has implications for planning, control and resource allocation.

### ***Performance Reporting***

35.47 Consistent information is necessary for performance reporting. Data supplied by local companies for central monitoring was found to be unreliable because of internal differences and

varying criteria used by individual companies to classify activities. The examination found the statistics in relation to new clients in 2006 were unreliable. The total number of new clients who availed of the service in 2006 was recorded as 14,504. However, when presented by age, gender, income status etc., the total came to 12,455 – a difference of 2,049 (14%). This gave rise to concerns over accuracy and reliability of the data.

35.48 The Department stated that the underlying software system (MABSIS) was rolled out on a phased basis from July 2005 and over the course of 2006. Almost inevitably, any new IT system would give rise to issues that would require modification of the system. Action had been taken to address any such inaccuracies promptly.

35.49 In regard to the resources used by the service, the Department received quarterly financial reports from the companies, who were also obliged to submit annual reports and audited accounts. Annual reports were reviewed in the MABS Unit in the Department.

35.50 At local level, monitoring focuses on client numbers – new, re-activated, active and discharged. Monthly activity reports relating to the number and type of clients who contacted the service, together with client demographic information, are submitted to boards for consideration.

35.51 The Combat Poverty Agency (CPA) suggested that performance reporting could be strengthened by publishing an annual report, a view supported by the CIB, which also suggested the introduction of a mechanism to assess the impact of the service. The Department stated that the CIB produced an annual report outlining its activities, which from 2009 onwards would include a report on the MABS.

The Department needs to introduce a standard definition of case types and details to be reported in order to ensure that the information is reliable and consistent. It should also complete a review of the current reporting software to ensure the reliability of the reports the system produces.

### ***Evaluation of the Service***

35.52 In a four phase evaluation between 1999 and 2002, one evaluation<sup>104</sup> concluded that

- the original stated objectives were still valid, but it was recommended that they be revisited and restated
- the primary target group for the service needed to be restated
- an agreed set of standards for the money advice process should be developed
- the national structure should be immediately reviewed and revised.

35.53 A report in 2002<sup>105</sup> suggested that a self-evaluation approach at company level should be adopted so as to facilitate quality reviews and strategic planning at that level. This would also feed into the ongoing national development of the service. Evaluation training and support, which would become part of the training calendar, should be provided for the companies. The report recommended that all companies should be invited to participate on a voluntary basis in thematic evaluations over an eighteen-month to two-year period, with each company conducting three pieces of applied research. It also recommended the greater use of trend analysis to generate thematic topics that could impact at national level.

104 National Evaluation of the Money Advice and Budgeting Service, Report for Phase Two, Eustace and Clarke, April 2000

105 MABS External Evaluation, Phase Three: Report of the Pilot Self-Evaluation Process, Eustace and Clarke, December 2002

35.54 A Peer Review in the Field of Social Inclusion Practices was conducted by the European Commission in November 2004, to examine the service and its transferability to other EU Member States. It found that over 90% of clients were satisfied with the service. The Peer Review members visited three companies.

35.55 The Department, in response to the evaluation process, noted the actions and commitments that had been undertaken.

- The MABS NAC restated the MABS objectives as continuing to be relevant and that the primary target group remains individuals or families on low incomes.
- Guidance to MABS boards of management and staff on all aspects of the service are provided in manuals.
- Commitments in relation to the introduction of a customer charter, a complaints procedure, and the development of quality assurance standards for the service have been made under 'Sustaining Progress'<sup>106</sup>. A Quality Assurance Working Group was established in late 2007. In July 2009 the Group produced an interim report which has been forwarded to the CIB and MABS NDL for follow up action.
- The next steps will be to seek third party certification of the standards, the development of appropriate training, the implementation of the standards across the network, and procedures for monitoring and evaluation.

### ***Indebtedness and Poverty***

35.56 No assessment of the impact of the service on other Department poverty reduction measures has been completed. The Department has stated that it would be difficult to draw generalised conclusions from an assessment of the impact of the MABS on poverty rates. Only a small percentage of social welfare customers have recourse to the MABS. The reasons people become over-indebted are complicated. Clients present to the MABS with debt owed to a variety of creditors. The top ten primary debt types include personal loans, utilities, credit cards, mortgages, hire purchase loans, overdrafts, rent arrears, catalogues, fines, and sub-prime loans. Clients that attend the MABS usually owe money to more than one creditor.

35.57 The Department is keen to get more information about the links between over-indebtedness and poverty. A number of research studies undertaken recently indicate that wider issues to do with financial inclusion, such as access to credit and other financial services, are also relevant to the issue of over-indebtedness, and to the possibilities that people on low incomes have available to them for managing their budgets.

35.58 The Department has stated that the findings from research studies by agencies such as the CPA<sup>107</sup>, the CPA on behalf of the Financial Regulator<sup>108</sup>, and the Financial Regulator<sup>109</sup>, together with the statistical information from MABSIS, are routinely considered in the Department for what they can contribute to an understanding of the nature and cause of over-indebtedness and the ways in which the MABS may respond to the needs of people on low incomes with debt difficulties.

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<sup>106</sup> Sustaining Progress was the Social Partnership Agreement for 2003-2005.

<sup>107</sup> A Policy Framework for Addressing Over-indebtedness, Stuart Stamp, April 2009

<sup>108</sup> Financial Exclusion in Ireland: An Exploratory Study and Policy Review, Caroline Corr, 2006

<sup>109</sup> A Report on the Licensed Moneylending Industry, Financial Regulator, March 2007

## Views of Related Agencies

35.59 The views of interested parties on the operation of the service were invited as part of the examination in June 2008. A submission by the CIB expressed concern over possible duplication and waste of resources by the service. It was of the view that the service lacked a national strategy, national statistics and a national annual report, which set out activity and measurable outputs. The autonomy of individual companies and the multiplicity of fora were also identified as matters of concern.

35.60 The CPA noted that there were a number of committees with roles in the oversight and functioning of the service. It considered that there was a need for greater clarity on the role of these committees.

## Views of the Accounting Officer

35.61 In response to my inquiries in regard to the organisation of the service following its transfer to the CIB, the Accounting Officer informed me that the enabling legislation provided for the amendment of the Citizens Information Acts, 2000 to 2007, to extend the functions of the CIB to include responsibilities in relation to the provision of the service. The legislation provided that MABS would be a separate and distinct service within the CIB. There would be no change in the status of the companies that constituted the service nor in the employment status of their employees.

35.62 A project plan to effect a smooth transfer of the responsibility for the MABS to the CIB had been completed with the assignment to take effect from 13 July 2009 following the commencement of Part Four of the Social Welfare (Miscellaneous Provisions) Act, 2008.

35.63 The Accounting Officer stated that the experience of the CIB in providing strong management support to the voluntary and community sector in the provision of a quality local public service was well recognised. The CIB managed 42 companies with voluntary boards of management employing 189 staff providing information, advocacy, and advice services in over 268 centres nationwide, comprising 106 Citizens Information Centres (54 full-time and 52 part-time) and 162 outreaches. It could provide the MABS with the support of a strong national leadership to assist in providing a high quality, coordinated budgeting and advice service that represented value for the taxpayer's investment. Overall, the synergies that already existed between the two services in terms of advocacy and the provision of information would be further enhanced by this move.

35.64 In terms of economy, the Accounting Officer stated that it was not envisaged that significant savings or additional costs would accrue on the assignment of responsibility for the provision of the MABS to the CIB. Rather, the intention was to provide strong management support to the local voluntary MABS companies in the provision of a quality service to meet the needs of people encountering debt difficulties. Cost efficiencies would be realised in the medium to longer term through premises co-location and the integration of support services such as administration and IT. It was not possible to quantify these potential cost efficiencies at this time.

35.65 The assignment of responsibility for the MABS represented a challenge for CIB, but it had extensive experience in managing a similar type structure through the Citizens Information Services network. In addition, the CIB had in the past been highly successful in managing the integration of the National Rehabilitation Board and the National Social Services Board with Comhairle, and the subsequent expansion of its functions under the CIB to include an enhanced information service for people with disabilities and specialised advocacy services.

## Conclusions

In 2008, the service cost €16.22 million. However, because of its dispersal across the country it is relatively costly, servicing 16,600 clients in 2008, or an average of less than 2 per week per head of staff.

While the service will function as part of the wider CIB network from 2010 onwards, the change is not projected to yield substantial financial savings since MABS will retain its current structure within the CIB. In order to identify any possible savings, there needs to be early identification of the extent of surplus property and the potential for shared services within the new CIB structure.

Overall, the audit results suggest a need to review the service in order to determine the extent to which

- it is meeting the needs of the target population
- its resourcing is based on identified service demand, evidenced by comprehensive management information
- additional synergies leading to service efficiency may be achievable within the wider CIB network
- it is positioned to meet the emerging demand that is likely to result from the current economic downturn.

From a service effectiveness viewpoint, the quality assurance and standard setting work initiated in 2007 needs to be brought to a conclusion.