

## ISI RLE Consultation

In general, Revenue welcomes ongoing reviews of RLEs and see the proposed changes as positive. In reality, PIP's and creditors take a common sense approach to a lot of these costs already. Specific comments on the questions raised are as follows:

- 1) Adult children in 3<sup>rd</sup> level (under 23)  
A study is to be carried out to assist in determining range of values here and in the meantime it is proposed to move this cost to Special Circumstance but pending the study allow the 2<sup>nd</sup> level allowance without the child's benefit deduction. In principal Revenue has no issue with this once all household incomes are incorporated i.e. it is quite common for college-going children to have part time income.
- 2) Car / Home Insurance  
Move away from the current modest allowance and allow for actual insurance paid under special circumstances. In principal Revenue has no issue with this once there is clear evidence that costs are kept to a minimum i.e. What steps are taken to ensure the most inexpensive cover is obtained – e.g. fire & theft is acceptable / is comprehensive cover really required etc.
- 3) Holiday allowance  
Proposal is to introduce one – Revenue has no issue once it is clear and not open to being abused.
- 4) Health Insurance  
The MESL have taken on board arguments for the requirement to have it as an allowable cost and whilst the ISI favoured approach is to continue to evaluate it on a case by case basis and where suitable allow it under special circumstances. Revenue would concur with the ISI approach being the fairest in balancing respective debtor and creditor interests.
- 5) Should revised costs apply to new cases only and if not what mechanism could be suggested.  
Revenue believe there is enough scope for the PIP to apply for a variation for arrangements already in place and revised costs should only apply to new cases.