

11 November 2022

Tēnā koe

On 20 April 2022, your request was transferred from the office of Hon Carmel Sepuloni to the Ministry of Social Development (the Ministry) requesting, under the Official Information Act 1982 (the Act), the following information:

• Any correspondence, advice, reports or memos between the Minister's Office and officials regarding the minimum wage exemptions and/or the proposed wage subsidy since the start of 2021

On 28 April 2022, the Ministry emailed you seeking clarification on which Wage Subsidy Scheme you were referring to. The Ministry also suggested refining your request for 'correspondence'.

On the same day, you advised that you were seeking information on a proposed wage subsidy scheme in relation to minimum wage exemptions for people with disabilities. Furthermore, you stated that you are referring to the 2019 wage supplement proposal which would top up the wage of those with disabilities on minimum wage exemptions.

As your request was clarified, under section 15(1AA) of the Act, the Ministry has treated your clarified request as a new request. As such the due date of your request was amended to 26 May 2022.

On 26 May 2022, the Ministry emailed you to advised you that more time was required to collate the information you have request. As such, the due date of the request was extended to 22 June 2022, in accordance with section 15(1) and 15A of the Act.

On 22 June 2022, the Ministry advised you that your request had been granted in part, however, required more time to prepare the information for release. As such, the due date was extended to 14 July 2022, in accordance with section 15(1)(a) of the Act.

I sincerely apologise for the delay in providing this response to you.

The Ministry has located the following documents containing information in scope of your request. The Ministry is providing you with the relevant excerpts from these papers as outlined below:

- **Appendix One** Relevant excerpts from *REP/21/2/114 Meeting with New Zealand Disability Support Network*, dated 9 March 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Karin Dalgleish, Policy Manager, Disability Policy).
- **Appendix Two** Relevant excerpts from *REP/21/3/308 Meeting with the PSA*, dated 7 April 2021 (for Hon Carmel Sepuloni, Minister for Social Development and Employment, Minister for Disability Issues; from Karin Dalgleish, Policy Manager, Disability Policy)
- **Appendix Three** Relevant excerpts from *REP/21/6/666 CCS Disability Action*, dated 7 July 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues, and Minister for Social Development and Employment; from the Ministry)
- **Appendix Four** Relevant excerpts from *REP/21/9/1010 Meeting with the Disability Rights Commissioner*, dated 23 September 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Shaun McMaster, Policy Manager, Disability Policy)
- **Appendix Five** Relevant excerpts from *Memo Minimum Wage Exemption Consultation Process*, dated 28 April 2022 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Shaun McMaster, Policy Manager, Disability Policy)
- **Appendix Six** Relevant excerpts from advice provided for Oral Parliamentary Question, Disability Issues, dated 24 June 2021 (for Private Secretary for Disability Issues; from the Ministry)
- **Appendix Seven** Relevant excerpts from email correspondence between the Office of Hon Carmel Sepuloni, Minister for Disability Issues and the Ministry.

On 2 June 2022, you advised you do not require the names of staff members below tier 4. As such, names of staff members have been withheld as 'out of scope.' I have provided staff job titles in **Appendix Seven** to provide context on the agency or organisation that is the author of the email correspondence in scope of your request.

Some information has been withheld under section 9(2)(f)(iv) of the Act, to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials. The release of this information is likely to prejudice the ability of government to consider advice and the wider public interest of effective government would not be served.

Furthermore, some information has been refused under section 9(2)(a) of the Act, to protect the privacy of natural persons. The need to protect the privacy of these individuals outweighs any public interest in this information.

Finally, some information has been withheld under 9(2)(g)(i) of the Act, to protect the effective conduct of public affairs through the free and frank expression of opinions. I believe the greater public interest is in the ability of individuals to express opinions in the course of their duty.

Three documents are also withheld in full under section 9(2)(f)(iv) of the Act, to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials. The release of this information is likely to prejudice the ability of government to consider advice and the wider public interest of effective government would not be served.

The principles and purposes of the Act under which you made your request are:

- to create greater openness and transparency about the plans, work and activities of the Government
- to increase the ability of the public to participate in the making and administration of our laws and policies
- to lead to greater accountability in the conduct of public affairs.

The Ministry fully supports those principles and purposes. The Ministry therefore intends to make the information contained in this letter and any attached documents available to the wider public. The Ministry will do this by publishing this letter on its website. Your personal details will be deleted and the Ministry will not publish any information that would identify you as the person who requested the information.

If you wish to discuss this response with us, please feel free to contact <u>OIA Requests@msd.govt.nz.</u>

If you are not satisfied with this response regarding minimum wage exemptions, you have the right to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or 0800 802 602.

Yours sincerely

Magnus O'Neill General Manager Ministerial and Executive Services

Appendix One: Relevant excerpts from REP/21/2/114 - Meeting with New Zealand Disability Support Network, dated 9 March 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Karin Dalgleish, Policy Manager, Disability Policy)

Key issues

Replacing Minimum Wage Exemption permits

MSD is continuing to progress work to replace Minimum Wage Exemption (MWE) permits. Cabinet noted in November 2019 your preferred approach to replacing MWE permits was a Government wage supplement. Replacing MWE permits with a wage supplement was also a 2020 election manifesto commitment.

We are currently developing a Government-mandated wage assessment tool to support the introduction of a wage supplement. This tool will be used to assess the wages of employees with an MWE permit. We will be trialling the new tool with one of the Business Enterprises (an MSD-contracted organisation employing disabled people with MWE permits).

Talking points

Replacing Minimum Wage Exemption permits

- In November 2019, Cabinet noted my preferred approach to replacing Minimum Wage Exemption permits is a Government wage supplement.
- Replacing the Minimum Wage Exemption scheme with a wage supplement is also one of our election manifesto commitments.
- MSD is continuing to progress work on a wage supplement. Officials are currently developing a wage assessment tool to assess individual employees' wages prior to the introduction of a wage supplement.

Appendix Two: Relevant excerpts from REP/21/3/308 - Meeting with the PSA, dated 7 April 2021 (for Hon Carmel Sepuloni, Minister for Social Development and Employment, Minister for Disability Issues; from Karin Dalgleish, Policy Manager, Disability Policy)

Updates on the minimum wage exemption work programme

Minimum Wage Exemption Permits

The PSA supports the removal of minimum wage exemption permits (MWE).

This is a 2020 election manifesto commitment and MSD is progressing work to replace MWE permits with a wage supplement and is developing a wage assessment tool as a first step.

This tool will be used for consistent assessment of the wages of employees with a MWE permit. It will be trialled with a Business Enterprise.

Talking points

- In November 2019, Cabinet noted my preferred approach to replacing MWE is a Government wage supplement.
- Replacing the MWE scheme with a wage supplement is also one of our election manifesto commitments.
- MSD is continuing to progress work on a wage supplement. Officials are currently developing a wage assessment tool to assess individual employees' wages prior to the introduction of a wage supplement.

Appendix Three: Relevant excerpts from REP/21/6/666 - CCS Disability Action, dated 7 July 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues, and Minister for Social Development and Employment; from the Ministry)

Minimum Wage Exemption Permits

- MSD is currently developing a wage assessment tool to assess individual employees' wages in a fair and consistent manner. It will be used by all Business Enterprises to assess employees holding Minimum Wage Exemption permits (MWEPs).
- The use of the tool will be moderated and monitored, and results will be validated to ensure consistency and fairness across users. This tool will support the introduction of the proposed wage supplement to replace Minimum Wage Exemption permits.
- MSD was invited to speak to the CCS Disability Action Board on Friday 25 June. They told us that they share MSD's concerns around MWEPs and we shared our findings from a recent survey of Business Enterprises:
 - Three Business Enterprises pay their employees at least minimum wage.
 - The other 12 pay employees with MWEPs between \$1.25/hour and \$19/hour, with a mean of around \$6/hour.

Appendix Four: Relevant excerpts from REP/21/9/1010 - Meeting with the Disability Rights Commissioner, dated 23 September 2021 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Shaun McMaster, Policy Manager, Disability Policy)

Purpose of meeting/visit

This is the third of your regular quarterly meetings for 2021 with the Disability Rights Commissioner, Paula Tesoriero.

Paula Tesoriero has advised she wishes to discuss the following topics... and other measures to improve standard of living.

Other measures

Replacing Minimum Wage Exemption permits: This initiative would enable government to introduce a wage supplement to replace Minimum Wage Exemption (MWE) permits that affect approximately 900 disabled employees in New Zealand.

Appendix Five: Relevant excerpts from Memo – Minimum Wage Exemption Consultation Process, dated 28 April 2022 (for Hon Carmel Sepuloni, Minister for Disability Issues; from Shaun McMaster, Policy Manager, Disability Policy)

1. In response to a meeting request received by your Office, this memo summarises the contributions of Martin Wylie and Altus Enterprises to our consultations on work related to replacing the Minimum Wage Exemption with a wage supplement approach.

The 2019 consultation on the wage supplement approach

- 2. On 12 December 2018, Cabinet directed MSD and MBIE to consult with targeted disability sector stakeholders to identify the level of support for replacing the Minimum Wage Exemption (MWE) with a wage supplement approach and agreed on the discussion document to be used for this purpose.
- 3. A discussion document was released in February 2019 titled 'A wage supplement as an alternative to Minimum Wage Exemption permits'.
- 4. Martin Wylie wrote a response as the CEO of Altus Enterprises and compiled a submission on behalf of the Moreable Network. Both submissions were received on 30 April 2019.
- 5. Martin Wylie also attended a meeting in Wellington on 2 September 2019 as the CEO of Altus Enterprises with MSD and other Business Enterprises.
- 6. Key points from the above three communications included:
 - Altus and the members of the Moreable Network were opposed to the wage supplement approach and did not consider the "perceived discrimination" of the MWE to be an issue that needs to be changed.
 - They did not consider that the MWE conflicts with the UNCRPD.
 - They felt that more work needed to be done to support the overall wellbeing of their employees and their whānau, the impact on Business Enterprises, and the impact on the role that the Government plays in supporting those less able.
 - The supplement would change Business Enterprises from commercial entities to dependants on Government.
 - With all employees being paid minimum wage or above, those in supervisory roles will need to have a wage adjustment to ensure there is an appropriate level of relativity in pay, which will introduce extra costs into the system.
 - Business Enterprises will not be viable if the supplement is to be adopted, resulting in job losses and increased social isolation for disabled workers.

- They are concerned about unintended consequences, such as some disabled people being financially worse off if the supplement is implemented as a result of benefit eligibility criteria.
- They agree that there are opportunities to improve the MWE framework, particularly through a review of the wage assessment tool.
- They suggest an increase to Business Enterprises' existing funding rates from MSD to reflect increases in costs and the removal of the cap on how many people an organisation can employ.

The 2021 consultation on the wage assessment tool

- 7. On 12 April 2021, a survey was sent to consult with Business Enterprises on the MWE work and the development of a wage assessment tool to be used to support a wage supplement approach.
- 8. On 5 May 2021, Altus Enterprises submitted a response to the survey alongside a copy of their tool.
- 9. The condensed survey results were sent back out to the participants that shared the tools on 31 May 2021.
- 10. The survey results gave MSD more information about the current situation in Business Enterprises and got their perspective of the move to a wage supplement. The information collected included:
 - the range of rates of pay currently paid
 - what supports Business Enterprises viewed as needing due to the proposed changes
 - advantages and disadvantages of a wage supplement
 - what issues they can see for the various parties
 - where costs will increase for Business Enterprises, and other Business Enterprise concerns.
- 11.The current tools used by Business Enterprises, which were shared with MSD as part of the survey, fed into the design of the tool that has been created to implement a wage supplement.

MSD has considered feedback received through the consultation process

- 13.We have considered the feedback from Altus, the Moreable Network and Martin Wylie alongside other feedback, and have done a range of things to mitigate the concerns.
- 14.Modelling created by officials and consultation with the disability sector has shown that a wage supplement is the only feasible option to replace MWE permits while protecting existing jobs. Further modelling has been developed to show that no individual receiving the wage supplement and on a Supported Living Payment benefit would be worse off under the proposed approach. In

the unlikely scenario where a person is worse off under the supplement approach, there are some discretionary mechanisms that could be applied in order to disregard all or part of the individual's income as chargeable income for benefit purposes.

Appendix Six: Relevant excerpts from advice provided for Oral Parliamentary Question, Disability Issues, dated 24 June 2021 (for Private Secretary for Disability Issues; from the Ministry)

Minimum Wage Exemption

- Currently, approximately 900 disabled people can be legally paid less than the minimum wage on the basis that their disability (usually an intellectual disability) makes them less productive. This is enabled under the Minimum Wage Act 1983.
- MSD and MBIE are currently progressing work on developing a wage supplement approach to replace Minimum Wage Exemption permits.
- The wage supplement approach would involve MSD supporting employers by providing a wage supplement that would contribute towards employers paying eligible disabled staff the minimum wage.
- Most, if not all, disabled employees will be better off financially receiving the wage supplement. No disabled employee will be worse off financially.
- Modelling by officials and consultation with the disability sector has identified that a wage supplement is the only viable option to replace Minimum Wage Exemption permits while still protecting existing jobs for disabled people.
- MSD carried out public consultation from mid-February to 30 April 2019 and a total of 210 public submissions were received. On November 2019, Cabinet considered advice on the results of public consultation and the proposed design of the wage supplement.
- MSD is currently developing a wage assessment tool to assess individual employees' wages, which will support the introduction of a wage supplement. It will be used by all Business Enterprises to assess employees holding Minimum Wage Exemption permits.
- The use of the tool will be moderated and monitored, and results will be validated to ensure consistency and fairness across users. This tool will support the introduction of the proposed wage supplement to replace Minimum Wage Exemption permits.

Appendix Seven: Relevant excerpts from email correspondence between the Office of Hon Carmel Sepuloni, Minister for Disability Issues and the Ministry

From: Private Secretary (Social Development) To: MSD Sent: Monday, 17 January 2022 12:13 pm Subject: Ministerial consultation - Minimum Wage Review 2021

The office has just received the attached Cabinet paper for Ministerial Consultation on Minimum Wage Review 2021. Apologies, this is for short turnaround , can we please get collated MSD feedback by COP tomorrow 18 January?

From: ODI (MSD) To: Private Secretary (Social Development) Sent: Tuesday, 18 January 2022 3:37 PM Subject: ODI input re Ministerial consultation - Minimum Wage Review 2021

Thank you for asking the Office for Disability Issues (ODI) to provide input into the Ministerial consultation on the 'Minimum Wage Review 2021' Cabinet paper. ...

Consideration needs to be given to how these changes in Minimum Wage will impact on associated decisions regarding the Minimum Wage Exception processes and calculations. Approximately 900 disabled people are impacted by this program.

From: Policy Analyst, Disability Policy, MSD To: Private Secretary for Disability Issues Sent: Wednesday, 19 January 2022 10:17:22 am Subject: RE: ODI input re Ministerial consultation - Minimum Wage Review 2021

We have some more information to provide you with on your points below (specifically the parts that you've highlighted in green). Please see the additional info in blue. ...

- Consideration needs to be given to how these changes in Minimum Wage will impact on associated decisions regarding the Minimum Wage Exemption processes and calculations. Approximately 900 disabled people are impacted by this program. Minimum wage increases may not be passed on to disabled people as part of the programme [some text withheld under section 9(2)(f)(iv)] (a manifesto commitment).
 - The bottom line with the introduction of a wage supplement to replace minimum wage exemption permits is no disabled employee will be worse off financially or adversely impacted with a wage supplement. The design of this project/programme, including any calculations and processes, will be completed in a way that ensures employees currently on minimum wage exemption permits will get paid the

minimum wage and that employers cannot choose to not pass on the increase (in Minimum Wage). [some text withheld under section 9(2)(f)(iv)].

From: Private Secretary for Disability Issues To: Shaun McMaster, Policy Manager, Disability, MSD Sent: Thursday, 17 March 2022 9:07 a.m. Subject: Due 10.30am: - Interview Request - Minimum Wage Exemption

Could I please get some advice on whether the Minister should front the interview below around minimum wage exemption. Keen to get some rationale behind her fronting the interview and some indication of what she would talk about. We're also considering referring this to Minister Wood so let me know if you think that's a preferable option.

•••

How are you? I hope all is well with you. I'm following up my previous email as we had to reschedule our filming to April this year. We would still very much like to interview Minister Sepuloni for this episode about the minimum wage exemption given that this is something that affects the disabled community. We would only require 20 minutes and will be filming in Auckland as well as Wellington so will be able to be flexible around availability. Please let me know how best to arrange this.

From: ODI (MSD) To: Private Secretary for Disability Issues Sent: Thursday, 17 March 2022 9:33 AM Subject: RE: Due 10.30am: - Interview Request - Minimum Wage Exemption

While Minister Wood is the Minister responsible for the Minimum Wage Exemption Scheme (under the Workplace Relations and Safety portfolio), Minister Sepuloni (both as Minister for SD and DI) is jointly responsible for the policy work programme to replace MWE with a wage supplement.

If the interview is about the disability rights elements of the MWE and plans to replace it, then it would be appropriate for Minister Sepuloni to speak to that. However, if the interview is more around the operation and issues of the current MWE scheme then I would not recommend Minister Sepuloni front that – this would sit more with the Minister for Workplace Relations and Safety.

That being said, 20 minutes is a long interview for the Minister on this topic as she will not be able to speak in any detail about implementation plans [some text withheld under section 9(2)(f)(iv)]. On that basis, the Minister may wish to consider declining the interview or have it run for a shorter duration.

Below is information which MBIE shared with us that they prepared for Minister Wood when this same interview request was originally referred to him. ... I have updated the content slightly to reflect current state of play.

Background information for Minister

- Repealing the Minimum Wage Exemption Permit (MWE) system has been included in successive NZ Disability Action Plans (NZDAP), including in the current NZDAP 2019-2023. The MWE system is viewed as discriminatory by many in the disability sector, since it enables disabled people to be paid less than the minimum wage.
- In December 2018 [SWC-18-MIN-0188 refers], a discussion document was released to seek views from the disability sector on whether a wage supplement (to replace the MWE system) had widespread support, and the possible design of a wage supplement approach, including the methods of calculating and paying the wage supplement.
- In 2019, Minister Sepuloni (as both Minister for Social Development and Minister for Disability Issues) and the previous Minister for Workplace Relations and Safety reported back to Cabinet on the findings of that consultation. Although opinions were divided on the merits of replacing the MWE system with a wage supplement, the Cabinet paper noted the Ministers' view that the only feasible option was to introduce a wage supplement approach to replace the MWE system [SWC-19-MIN-0189 refers].
- [some text withheld under section 9(2)(f)(iv)].
- MSD has contracted an external provider to develop a wage assessment tool, which is intended to be used to assess employees' "pre-supplement" wages in a fair and consistent manner under the proposed wage supplement system.
 MSD is currently trialling the tool with some Business Enterprises to test its operation prior to national implementation to all employers in the future.

Public-facing lines

- Replacing MWE permits is a commitment in the NZ Disability Action Plan 2019-2023 and will improve New Zealand's alignment with our international commitments (e.g. United Nations Convention on the Rights of Persons with Disabilities). Replacing MWE permits is also a 2020 election manifesto commitment under the Disabilities section "Labour will replace the Minimum Wage Exemption with a wage supplement to ensure disabled people are paid at least the minimum wage."
- In recent years, steps have been taken to implement this commitment. MSD, with support from MBIE, have been leading a work programme that will enable government to introduce a wage supplement to replace MWE permits. MWE permits currently enable approximately 900 disabled employees in New Zealand to be paid less than minimum wage on the basis that their disability makes them less productive. MWE permits are enabled through current legislation (Section 8 of Minimum Wage Act).
- MSD is responsible for the design and would also be responsible for the implementation of the wage supplement. A wage supplement will effectively top up the wage rates for disabled employees who currently have MWE permits, so that employers can pay minimum wage to this group of employees. Modelling by officials and the consultation with the disability sector has shown that a wage supplement is the only feasible option to replace MWE permits while still protecting existing jobs.
- MSD has recently finished developing a wage assessment tool to assess individual employees' wages in a fair and consistent manner. MSD intends that Business Enterprises (organisations that are the primary employers of disabled people holding MWE permits) will use them to assess employees holding MWE permits to support the introduction of the wage supplement.

From: Policy Analyst, Disability Policy, MSD To: Private Secretary for Disability Issues Sent: Wednesday, 6 April 2022 2:59 PM Subject: Due COP today - MWE work update

Thanks for sending this through. We are happy to send the same public-facing lines, with one small change to the last point as below:

Public-facing lines

- Replacing MWE permits is a commitment in the NZ Disability Action Plan 2019-2023 and will improve New Zealand's alignment with our international commitments (e.g. United Nations Convention on the Rights of Persons with Disabilities). Replacing MWE permits is also a 2020 election manifesto commitment under the Disabilities section "Labour will replace the Minimum Wage Exemption with a wage supplement to ensure disabled people are paid at least the minimum wage."
- In recent years, steps have been taken to implement this commitment. MSD, with support from MBIE, have been leading a work programme that will enable government to introduce a wage supplement to replace MWE permits. MWE permits currently enable approximately 900 disabled employees in New Zealand to be paid less than minimum wage on the basis that their disability makes them less productive. MWE permits are enabled through current legislation (Section 8 of Minimum Wage Act).
- MSD is responsible for the design and would also be responsible for the implementation of the wage supplement. A wage supplement will effectively top up the wage rates for disabled employees who currently have MWE permits, so that employers can pay minimum wage to this group of employees. Modelling by officials and the consultation with the disability sector has shown that a wage supplement is the only feasible option to replace MWE permits while still protecting existing jobs.
- MSD is developing a wage assessment tool to assess individual employees' wages in a fair and consistent manner. MSD intends that Business Enterprises (organisations that are the primary employers of disabled people holding MWE permits) will use them to assess employees holding MWE permits to support the introduction of the wage supplement.

Given the joint-agency nature of this work, the office might want to consider informing/copying the office of the Minister for Workplace Relations on any response.

From: Private Secretary for Disability Issues To: Policy Analyst, Disability Policy, MSD; Shaun McMaster, Policy Manager, Disability, MSD Sent: Tuesday, 26 April 2022 4:32 PM Subject: Due COP today - MWE work update

A question regarding the below background information previously provided. What is the current state of play of the wage assessment tool? ...

• Repealing the Minimum Wage Exemption Permit (MWE) system has been included in successive NZ Disability Action Plans (NZDAP), including in the current NZDAP 2019-2023. The MWE system is viewed as discriminatory by

many in the disability sector, since it enables disabled people to be paid less than the minimum wage.

- In December 2018 [SWC-18-MIN-0188 refers], a discussion document was released to seek views from the disability sector on whether a wage supplement (to replace the MWE system) had widespread support, and the possible design of a wage supplement approach, including the methods of calculating and paying the wage supplement.
- In 2019, Minister Sepuloni (as both Minister for Social Development and Minister for Disability Issues) and the previous Minister for Workplace Relations and Safety reported back to Cabinet on the findings of that consultation. Although opinions were divided on the merits of replacing the MWE system with a wage supplement, the Cabinet paper noted the Ministers' view that the only feasible option was to introduce a wage supplement approach to replace the MWE system [SWC-19-MIN-0189 refers].
- In order to implement a wage supplement approach, [some text withheld under section 9(2)(f)(iv)].
- MSD has contracted an external provider to develop a wage assessment tool, which is intended to be used to assess employees' "pre-supplement" wages in a fair and consistent manner under the proposed wage supplement system.
 MSD is currently trialling the tool with some Business Enterprises to test its operation prior to national implementation to all employers in the future.

From: Policy Analyst, Disability Policy, MSD To: Private Secretary for Disability Issues Sent: Tuesday, 26 April 2022 5:08 PM Subject: RE: Due COP today - MWE work update

We've had a chat with our contracts team, and they have advised that a draft wage assessment tool has been developed and has been tested with one business enterprise. Work on the tool is continuing. [some text withheld under section 9(2)(f)(iv)].

From: Shaun McMaster, Policy Manager, Disability, MSD To: Private Secretary for Disability Issues Sent: Tuesday, 26 April 2022 6:20:35 pm Subject: RE: Due COP today - MWE work update

Following the testing with the Business Enterprise, MSD is now reviewing the next steps on the tool.