

# SCoREBOARD

## Billing Processes – H1 2024

Hungarian NSG

### Background

Since publication of the [Collateral Management Harmonisation Report](#) in December 2017, the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) has made a number of significant breakthroughs in its ambition to create a **Single Collateral Management Rulebook for Europe (SCoRE)**.

### What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by November 2024. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

National stakeholder groups (NSGs) are coordination forums that have been established in the markets covered by the AMI-SeCo to support the implementation of the Single Collateral Management Rulebook for Europe (SCoRE).

The Single Collateral Management Rulebook for Europe contains four Standards related to billing processes (published as the [SCoRE Standards for Billing Processes](#)). Implementation progress is monitored twice per year.

### Introduction

This summary report presents the results of the H1 2024 monitoring exercise conducted by the Hungarian NSG with the involvement among the following stakeholders:

- 1 CSD – KELER
- 8 Custodians

9 entities are monitored in the Hungarian market

In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 11 inclusive “Final external communication on SCoRE” (with a deadline of 22 May 2023) as described in section 3 below.

Section 1 presents the key takeaways per Entity Type i.e., CSD, TPA, Custodian etc. Section 2 depicts the compliance status with the standards by each entity type. Section 3 focuses on the progress against the individual milestones and Section 4 provides concluding remarks.




## 1 Key takeaways

Implementation of the Billing Processes Standards in the Hungarian market is behind schedule based on the agreed milestones

KELER CSD and 2 Custodians out of 8 responded to the H1 2024 survey, which is a higher number of responses compared to H1 2023. This section presents the key findings of the survey for each entity type. Previous answers are also considered.

KELER CSD and the respondent Custodians are behind schedule based on the agreed milestones.

**Figure 1**  
**Summary of the monitoring exercise**

	 Response Rate	 Implementation Status	Are all milestones 1 to 11 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 18 November 2024) ?
Custodians	38%	Implemented 13.64% Implementation started 0% Analysis started 18.18% Analysis not started 0% Replies not submitted 68.18% ----- Non applicable standards 8.33%	Average % of milestones achieved 15%	% of custodians on time 13%
CSD - KELER	Survey submitted	Implemented 0% Implementation started 20% Analysis started 40% Analysis not started 40% ----- Non applicable standards 0%	No	11/26

## CSD - KELER

KELER CSD is behind schedule based on the agreed milestones, with analysis being conducted regarding Standards 2 to 4

KELER CSD follows a two-tiered approach regarding the implementation of the Billing Processes Standards, with different target dates applying to Standard 1 and Standards 2 to 4.

KELER CSD plans to start the necessary analyses regarding the implementation of Billing Standard 1 on ISO 20022 messaging on 1 December 2024 with a planned implementation date of 30 November 2026. Since KELER is located in a non-euro member state the final deadline of standard 1 (wave2) differs from the wave 1 deadlines (2024 vs. 2026), consequently KELER will not achieve full compliance by November 2024 (note: as per KELER's adaptation plan standard 1 will be implemented until 30/11/2026).

KELER CSD planned to start implementation on Standards 2 to 4 by 14 July 2024. Analysis regarding standards 2-4 are now in progress however it is important to note that there are more services (part of securities account management and securities settlement) where the compliance with standards 2-4 is already completed furthermore an IT development was already finished also. KELER also indicates that the implementation project is under review, therefore the timelines provided might be changed in the future.

In addition, KELER also analyses whether the standards could be applied for services other than securities account management and securities settlement services as well.

### Custodians

Two custodians responded to the survey

The respondent custodians indicated the following levels of compliance with the Standards. For Standard 1 on receiving ISO messages, one Custodian indicated ongoing analysis, while the other respondent indicated the standard as not applicable until Wave 2.

For Standard 2 on Billing cycles, both custodians indicated full compliance.

In the previous survey, for Standard 1 on providing ISO messages, one Custodian indicated ongoing analysis.

## 2 Compliance level with the standards

This section provides an overview of the current status of compliance with the billing processes standards. CSDs and TPAs are monitored on an individual basis and are assigned a colour-code status in accordance with the methodology outlined in Figure 2 below. Custodians are presented on an aggregated basis per market and assigned a percentage representing their compliance status.

**Figure 2**  
Standards implementation status as defined in the AMI-SeCo framework document



- The Standard has been implemented
- Implementation of the Standard is on schedule (based on the agreed milestones)
- Implementation is behind schedule (based on the agreed milestones)
- Implementation has not started

**Table 1**  
Compliance level with the standards by each entity type

STANDARD	Custodians	CSD - KELER
1: ISO 20022 messaging	0%	R
2: Billing cycles	38%	Y
3: Cut-off date		Y
4: Dates for payments fees		G

Notes:

- For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in Box 1 above.
- For custodians the % indicates the percentage of custodians which have implemented the standard or have the standard under development and implementation.
- Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market.

### 3 Progress towards the milestones

This section tracks market stakeholders progress in implementing the Standards against the 13 set milestones identified by AMI-SeCo.

The milestones facilitate consistent implementation across markets (given the long-term efforts that are needed) and avoids issues remaining undetected until the deadline to achieve compliance and implementation of the standards.

**Table 2**  
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	<b>Analysis Started:</b> Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
M2	<b>Initial Communication:</b> Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	<b>Analysis Completed:</b> Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	<b>Documentation Completed:</b> Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
M5	<b>Detailed External Communication:</b> Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
M6	<b>SCoRE Adaptation Started:</b> Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	<b>SCoRE Adaptation Complete:</b> Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	<b>Internal Testing Started for SCoRE:</b> Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
M9	<b>Internal Testing Complete for SCoRE:</b> Have you completed the necessary internal testing?	10/03/2023
M10	<b>External Testing Started for SCoRE:</b> Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	22/05/2023
M11	<b>Final External Communication on SCoRE:</b> has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	22/05/2023
M12	<b>External Testing Completed for SCoRE:</b> Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/09/2024
M13	<b>SCoRE Standards Implemented:</b> have the SCoRE Standards been implemented?	18/11/2024

The current H1 2024 monitoring exercise focuses on milestones 1 to 11 given that Milestone 11 “Final external communication on SCoRE” (with a deadline of 22 May 2023) was meant to have been achieved by the time the survey closed.

In each survey round, all the entities are asked to confirm (on a yes/no basis) whether the milestones will be met by the set milestones dates. If it is not the case, they are also asked the expected date for when the milestone will be reached.

For the milestones which had to be achieved by the time the survey closed: the blue colour code is assigned to those milestones that have been successfully achieved.

Milestones that will only be achieved later than their set deadline are assigned a yellow status with indication of the likely date of achievement.

For the milestones that are only due to be achieved after the current reporting cycle: the green colour code indicates that the entity anticipates achieving that future milestone on time. A yellow status indicates that the milestone is foreseen to be met later than the set milestone date. In this case, the date of achievement anticipated is also indicated in the table.

As already indicated in Section 1 KELER CSD follows a two-tiered approach regarding the implementation of the Billing Processes Standards, with different target dates applying to Standard 1 and Standards 2 to 4. KELER CSD plans to comply with standards 2-4 by December 2024 however with Standard 1 by November 2026. KELER notes that the implementation project for standards 1-4 is under review, therefore the timeline provided might be changed in the future.

**Table 3**  
Expectation of achieving the milestones at the set dates

	Custodians	CSD - KELER
Milestone 1 June 2020	25%	Yes
Milestone 2 March 2021	25%	Yes
Milestone 3 July 2021	13%	12/24
Milestone 4 December 2021	13%	02/25
Milestone 5 December 2021	13%	03/25
Milestone 6 January 2022	13%	02/25
Milestone 7 June 2022	13%	08/25
Milestone 8 July 2022	13%	09/25
Milestone 9 March 2023	13%	01/26
Milestone 10 May 2023	13%	02/26
Milestone 11 May 2023	13%	10/26
Milestone 12 September 2024	13%	09/26
Milestone 13 November 2024	13%	11/26

## 4 Concluding remarks

KELER CSD and 50% of Custodians indicated that Milestone 6 was met on time. However, in the case of KELER CSD, Milestones 3, 4 and 5 are expected only at later points in time, and the completion of Milestone 6 refers only to Standards 2, 3 and 4. Overall, this shows significant delays in the implementation of the Billing

Standards in comparison with the deadlines valid for member states in eurozone however the schedule is in line with final deadline stated in KELER's adaptation plan.

However, KELER CSD reports that it plans to achieve the final milestone by December 2024 regarding Standards 2, 3 and 4, which predicts market-wide compliance regarding Standards 2, 3 and 4. However, KELER indicates also that the timeline provided might be changed in the future.

According to KELER CSD's two-tiered approach, it envisions delays with all agreed milestones regarding Standard 1 on ISO 20022 messaging compared with the deadlines valid for member states in eurozone. Nevertheless, KELER CSD does not expect delays compared to its approved adaptation plan, which expects full compliance by 30 November 2026.

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