



Australian Government
Repatriation Medical Authority

Submission Guidelines

Introduction

In accordance with section 370CL of the *Military Rehabilitation and Compensation Act 2004* (MRCA) the following persons and organisations may make a submission in writing to the Repatriation Medical Authority (the Authority):

- ◆ a person who is eligible to make a claim for compensation under section 319 of the *Military Rehabilitation and Compensation Act 2004* (the MRCA); or
- ◆ an organisation representing veterans, Australian mariners or members of the Forces; or
- ◆ an organisation representing members or their dependants; or
- ◆ the Repatriation Commission; or
- ◆ a person having expertise in a field relevant to the investigation.

A person or organisation may not make a submission on a legal matter nor be represented before the Authority by a legal practitioner.

Sound Medical-Scientific Evidence

The Authority can make a Statement of Principles about a particular kind of injury, disease or death only where there is sufficient **sound medical-scientific evidence** justifying the making of the Statement of Principles.

Information about a particular kind of injury, disease or death is taken to be **sound medical-scientific evidence** if:

- (a) the information:
 - (i) is consistent with material relating to medical science that has been published in a medical or scientific publication and has been, in the opinion of the Authority, subjected to a peer review process; or
 - (ii) in accordance with generally accepted medical practice, would serve as the basis for the diagnosis and management of a medical condition; and
- (b) in the case of information about how that kind of injury, disease or death may be caused - meets the applicable criteria for assessing causation currently applied in the field of epidemiology.

Submission Material

Submissions should be structured, informative and relevant and where medical-scientific information is submitted, it would assist the Authority if:

- ◆ the review articles or authoritative reports focussed on causation; and
- ◆ the sources quoted were the result of a medical-scientific literature search concerning the causes of the particular injury, disease or death; and
- ◆ the material quoted or referred to, is referenced; and
- ◆ the abstracts of relevant material are attached to the submission.?

Where literature searches of Medline or other medical databases are conducted, it would assist the Authority if searches of those databases are undertaken for English language publications written during the past ten years and are about the causes of the particular injury, disease or death.

If a literature search is undertaken, the search process used and the search criteria applied could be included in the submission.

Standard textbooks or general reviews in respected medical journals, when unreferenced, will be taken as unsubstantiated opinions.

Material taken directly from web sites can be used but only if the author or organisation is recognised as authoritative.

A personal medical history or an unreferenced opinion from a treating doctor are not sound medical-scientific evidence as defined above.

Evaluation of Material by the Authority

The Authority can make a Statement of Principles about a particular kind of injury, disease or death where there is sufficient *sound medical-scientific evidence* justifying the making of the Statement of Principles.

If the Authority has previously decided not to make a Statement of Principles, or has already made a Statement of Principles, in respect of the particular condition, it may only make a new Statement of Principles if it thinks there is a *new* body of sound medical-scientific evidence that, together with the sound medical-scientific evidence it has previously considered, justifies the making or amendment of a Statement of Principles.

The Authority is required to assess material against certain epidemiological criteria. The criteria set out below are not exhaustive and may not be relevant in all cases. They are provided as a guide to the material that is acceptable to the Authority.

Information may assist the Authority if it is contained in human studies that are well-designed and measure relevant outcomes. Animal and experimental studies may provide useful supporting information for human studies if they provide information about the biological plausibility of an association.

Assessing Combined Epidemiological Evidence

The material that you intend to submit in support of your case will be closely examined against these criteria:

- ◆ strength of association;
- ◆ consistency;
- ◆ specificity;
- ◆ temporality;
- ◆ biological gradient;
- ◆ plausibility;
- ◆ experimental evidence.

When evaluating against competing hypotheses, the Authority will take into account the above criteria as well as the coherence of the information. You may wish to refer the Authority to a relevant meta-analysis, or the Authority may use an existing such analysis or have one commissioned.

Suggested Format

The Authority suggests that the following format be followed for submissions:

- ◆ begin by stating the purpose of the submission. List the factors that you think cause (or do not cause) the condition;
- ◆ describe any literature search you may have conducted;
- ◆ discuss these various factors in the order in which you have listed them in the introduction. Reference all medical-scientific material that you refer to or discuss;
- ◆ if you have referred to sound medical-scientific evidence in the submission, attach an Appendix of References. This attachment should contain *abstracts* of the articles and other references that you have referred to in your submission.

Submissions should be lodged [on-line](#) or can be emailed or mailed to:

Repatriation Medical Authority
GPO Box 1014
Brisbane Qld 4001
info@rma.gov.au

Disclosure of Information

Under section 370CM of the MRCA, certain decisions made by the Authority are reviewable by the Specialist Medical Review Council (SMRC). If a valid application for review by the SMRC is made, the MRCA requires the Authority to disclose to the SMRC all information relevant to its determination or decision. This includes applications for investigation or review, and submissions received relevant to the matter being reviewed by the SMRC.