

**Thematic Analysis of Submission Received on the Exposure Draft of the
Veterans' Entitlements, Treatment and Support (Simplification and Harmonisation Bill 2024**

Topic	Issue	Departmental Position	Next Steps
ADA	Concerns regarding TPI not being available to ex-service people when they reached 65 years and older.	ADA will now be available for eligible veterans	NFA
ADA	Concern regarding assistance and care for veterans once they pass retirement age	DVA will continue to provide support for the life of the veteran, not just those of working	NFA
ADA	If the proposed Additional Disablement Amount is included in the new scheme, I trust it will also provide the same eligibility for the spouse on the veteran's demise.	The Bill allows for this.	NFA
ADF	Australia must take a lead out of the Aussie military playbook in that after dogs serving the Aus military are able to be adopted by civilians after a behavioural assessment by the US army vets. A large number of retired MWDs have been adopted by families following service and assessment. In the Australian military if a handler does not wish to retire the allocated dog there is no choice other than euthanising.	Out of scope	NFA
Administration	Endorsement of merged Commissions.	Noted.	NFA.
Administration	Endorsement of merged Commissions.	Noted.	NFA.
Administration	Endorsement of merged Commissions.	Noted.	NFA.
Administration	Endorsement of merged Commissions.	Noted.	NFA.
Administration	Veterans' eligibility for benefits should be coordinated as far as possible on a whole-of-Government basis.	Noted.	For policy consideration.
Administration	There should be improved coordinated administration of payments across government.	Noted.	For policy consideration.
Administration	There should be improved coordinated administration of payments across government.	Noted.	For policy consideration.
Administration	Debt/overpayment recovery administration should reflect findings from the ROBODEBT Royal Commission.	Noted.	For policy consideration.
Administration	Disagrees with the reduction to 28 days from 42 days for the production of documents for the VRB.	Noted.	NFA.
Administration	The bill could have been a medium for addressing some of the identified Transition issues.	Noted.	For later consideration.

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Appeals	Will appeals from the VRB to the Administrative Appeals Tribunal or the Administrative Review Tribunal be heard by a panel of members or a member sitting alone?	The Administrative Review Tribunal Bill allows for multi-member panels to conduct merits reviews, thereby drawing on members with legal experience and those with lived experience of the relevant jurisdictional area.	NFA
Benefits	The calculation allowing the conversion of weekly amounts to lump sums should use the veteran's life expectancy, not their age.	Noted.	NFA.
Benefits	Provisions regarding the additional amount to be paid either to the impaired person or to the primary carer of an eligible young person or child do not sufficiently recognise the various caring arrangements that may apply.	Noted.	For policy consideration.
Case Law	Preservation of case law	Noted. All MRCA case law will be retained.	NFA
Claims process	Injuries reported by Defence should trigger a claims process.	Noted. Provision for 'CDF claims' already exists in the MRCA. Issue is partially addressed (and rendered unnecessary) by the proposed 'medical event on duty' provision.	For administration consideration.
Claims process	Seeking information on relevant conditions covered by Presumptive Liability	Noted.	NFA. Information provided.
Claims process	Seeking information on relevant conditions covered by Presumptive Liability	Noted.	NFA. Information provided.
Claims process	Contrasting with Presumptive Liability is the continued reliance on supporting medical evidence to prove a link to service.	Noted; some policy flexibility on this point.	NFA.
Claims process	No change to the needs-assessment process, which serves to delay compensation.	Noted. Following 1/7/26 the needs assessment process can be refined in policy and administration.	For administration consideration.
Claims process	Very supportive of maintenance of prohibition on legal practitioners at the VRB.	Noted.	NFA.

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Claims process	The precise date of clinical onset is often difficult to establish.	Known policy issue.	For policy consideration.
Claims process	The bill does not adequately address the complexity of establishing the 'date of effect'.	Noted. The Bill does allow for some clarification and simplification.	NFA.
Claims process	Worsening of VEA-accepted conditions should be assessed under existing VEA arrangements.	Noted.	NFA.
Claims process	Contended that medical reports are sometimes withheld.	There is no practice of not including a Medical Adviser opinion that has been provided for the purpose of the primary determination in the s.137 report	NFA
Claims process	Suggested 'self-executing time limit' mechanism for the determination of claims.	The MRCC's view was that statutory timeframes not be applied to MRCA initial liability claims, on the basis that statutory timeframes would not produce better outcomes for claimants.	NFA
Claims processing	Concerns with existing claims processes and qualifications of DVA staff	Being addressed as part of response to RC Interim report	For administration consideration
Claims processing	Improved consistency of decision making	Being addressed as part of response to RC Interim report	For administration consideration
Claims processing	Request to streamline claims lodgement process	Being addressed as part of response to RC Interim report	For administration consideration
Claims processing	Concerns that current assesment processes are unfairly biased and detrimental to veterans' mental health	Noted	For administration consideration
Claims processing	Request for improved processes for veterans/Defence members engaged on classified operations	Noted	For administration consideration
Claims processing	Suggests combining the initial liability and permanent impairment assessment process.	Noted	For administration consideration
Claims processing	Role of DVA CMA's in reviewing specialist reports	Noted.	For administration consideration
Claims processing	General criticism of DVA claims processes and the lack of support for applicants	Noted. Work is underway on the advocacy support system.	For further consideration
Claims processing	Eligibility for veterans residing overseas	Noted. This is in respect of service pension.	For later consideration

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Claims processing	Concerns with complexity of current claims process and requirement for veterans to provide evidence	Claim lodgement processes are being improved under the single ongoing Act model through changes to information sharing between DVA/Defence and the introduction of presumptive liability under the MRCA	For administration consideration
Claims processing	Suggestions to improve claims processing and reduce time taken to process entitlements	DVA has already put steps in place to assist with this (such as decision-ready policies). The introduction of Presumptive Liability provisions will also benefit claims processes.	For administration consideration
Claims processing	Request for timeframes to be included for decision-making	DVA has internal performance indicators for the processing of claims but is not supportive of legislating timeframes	NFA
Claims processing	Concerns with the application of timeframes to lodge claims	DVA will investigate claims irrespective of the length of time between incident and claim	NFA
Claims processing	Request to assess and treat claims for conditions separately, not combined	MRCA WPI rules to apply	NFA
Claims processing	Slow and inconsistent claims processing, leading to adverse mental health impacts	Noted	For administration consideration
Claims processing	Suggestions for improvements to claims processes	Noted	For administration consideration
Claims processing	Concerns with the requirement to provide evidence to support DVA claims	Noted.	For administration consideration
Claims processing	Request for face to face meetings when submitting a claim with the Department	Currently available	NFA
Claims processing	Removal of cap on compensation and one delegate handles initial liability and PI	MRCA WPI rules to apply in respect of compensation amounts, the other suggestion will be considered in administration.	Processing issue for potential future consideration

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Claims processing	Case-specific concerns (spinal condition not service-caused)	Noted	Refer to claims area for review
Commencement	I urge the stakeholders to reconsider the commencement date in the best interests of veterans and their families.	Noted	NFA
Common law damages	The common-law damages upper limit should be indexed twice a year.	Noted.	For later consideration.
Common law damages	The common-law damages upper limit should be indexed twice a year.	Noted.	For later consideration.
Complexity	Reduce the amount of paperwork required ie lifting reports by looking at job profiles	DVA has already put steps in place to assist with this (such as decision-ready policies). The introduction of Presumptive Liability provisions will also benefit claims processes.	NFA
Concessions	Question around why the ACT doesn't recognise White Cards for concession purposes	The setting of concessions is outside the scope of the reform work underway	For future consideration
Concessions	Request stamp duty to be waived in Western Australia like it is in Victoria	Out of scope	NFA
Consultation	The consultation deadline should have been extended to allow Royal commission final-report recommendations to be addressed.	Noted.	NFA.
Consultation	A requested extension to the consultation to allow more thorough examination of the changes was denied.	Noted.	NFA.
Consultation	Complexity of draft Bill	Noted	NFA
Consultation	Limited ability for veterans to understand technicalities of changes being proposed.	Noted	NFA
Consultation	Webinar timing unsuitable for 91 year old veteran	Noted	NFA
Consultation	Lack of targeted consultation with impacted veterans	Noted	NFA.
Consultation	Consultation to occur with the whole veteran community.	Noted	NFA
Consultation	Request revised closing date for submissions	Noted	NFA

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Coordination with other agencies	Do other agencies provide 'clearances' to prevent overpayments from DVA?	DVA compensation claims delegates will send a clearance to Services Australia when it is identified that a client may have been, or is currently, in receipt of Income Support payments from Services Australia payments.	NFA
Coverage	The proposed changes do not provide appropriate coverage to address the modern, multi-agency approach to (particularly) peacekeeping-type operations, e.g.. 'Team Australia'.	Longstanding issue, which is partially reflected in the accepted changing nature of warfare and the WoG approach to defence-type activities.	NFA.
Coverage	No extension of eligibility for all conditions, i.e.. cancer and TB.	Noted. Out of scope.	For later consideration.
Coverage	No extension of eligibility for all conditions, i.e.. cancer and TB.	Noted. Out of scope.	For later consideration.
Coverage	No extension of eligibility for all conditions, i.e.. cancer and TB.	Noted. Out of scope.	For later consideration.
Coverage	The bill should provide clarity about coverage on duty or on exercise or on deployment.	Noted. 'Injury on duty' will partly ameliorate this concern.	For policy consideration.
Coverage	Deployed police officers should be covered by standalone legislation with veteran-type benefits, with White Card equivalent benefit and 'veteran' status.	Noted. Longstanding issue.	NFA.
Coverage	The legislation should be amended to provide clarity on 24/7 coverage on deployment, exercise or operation.	The current policy approach supports flexibility to respond to the circumstances of service, with policies updated in line with relevant case law.	NFA
Coverage	A temporal test should be added, to replicate the 'medical event' provision in the DRCA.	The 'medical event on duty' head of liability is being added to the MRCA as part of this reform.	Change is included in the draft bill.
Coverage	The requirement that the "unintended consequences of medical treatment" should not be limited to treatment provided for an accepted service injury.	Amendment to allow for the "unintended consequences of medical treatment" to not be limited to treatment provided for an accepted service injury is being made.	Change is included in the draft bill.

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Coverage	The draft legislation does not address the Expert Advisory Group's recommendations to provide clarity about the definition of 'rendering defence service'	Two additional heads of liability (medical event on duty and presumptive liability) are being added to the MRCA, and will operate to ameliorate any perceived lack of clarity in determining what constitutes 'rendering defence service'.	Changes are included in the draft bill.
Coverage	Whether the Department should engage with the Department of Defence and the Attorney-General's Department regarding better recognition of peacekeeping service for ADF and non-ADF personnel	26 April F80 recognition and extension of benefits constitute a difficult environment for affected individuals, one that is longstanding and that has usually been responded to on the basis of the unique nature of military service.	The development of a Government position may benefit from a cross-department policy position.
Coverage	Request compensation for MWD's. Many of these dogs are euthanised far earlier than necessary due to the carers inability to afford the cost of ongoing treatment.	Noted	NFA
Coverage for non-ADF individuals	Coverage for police and other non-ADF peacekeepers has not kept pace with the nature of warfare and composition of deployments.	The 2011 Review of Military Compensation Arrangements concluded that it was not appropriate to provide police contingents access to a scheme that had been designed to provide for the unique nature of military service.	NFA
Cultural change	Concerns regarding the department looking to deny liability	Being addressed as part of response to RC Interim report	For administration consideration
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Cultural change	Concerns regarding the department looking to deny liability	Being addressed as part of response to RC Interim report	For administration consideration
Cultural change	Request to enact significant, welfare based, peer supported change asap for our veterans and their families	Being addressed as part of response to RC Interim report	For administration consideration
Cultural change	Criticism of reform process and complaints regarding claim outcomes	Noted	For administration consideration

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Cultural change	Reform doesn't go far enough to address the 'impersonal' nature of DVA supports	Noted	For administration consideration
Cultural change	Request to allow veterans lodging claims to be treated without suspicion and apply the legislation more beneficially	Noted	For administration consideration
Cultural change	Concerns that current assesment processes are unfairly biased and detrimental to veterans' mental health	Noted	For administration consideration
Cultural change	Concern with times taking to process claims		For administration consideration
Cultural change	Request to enact significant, welfare based, peer supported change asap for our veterans and their families	Noted	For later consideration
Cultural change	Concerns that current assesment processes are unfairly biased and detrimental to veterans' mental health	noted	NFA
Cultural change	Request for DVA to pay benefits lawfully determined and to apply the legislation beneficially for veterans	Noted	NFA
Cultural change	Change DVAs adversarial culture and give everyone a gold card.	Noted	NFA
Definition	Definition of 'Veteran' is inconsistent.	The Veterans Ministers' Round Table on 8 November 2017 agreed a common definition of the term 'veteran' - as 'a person who is serving or has served in the Australian Defence Force'.	A definition of 'veteran' will be included in the draft legislation. DVA notes the definition will have no effect on the operation of the Act as the term 'veteran' is not used in the MRCA.

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Definition	Definition of 'Veteran' is inconsistent.	The Veterans Ministers' Round Table on 8 November 2017 agreed a common definition of the term 'veteran' - as 'a person who is serving or has served in the Australian Defence Force'.	A definition of 'veteran' will be included in the draft legislation. DVA notes the definition will have no effect on the operation of the Act as the term 'veteran' is not used in the MRCA.
Definition	Clear definition of " dependant"	Noted	For later consideration
Definition	Comments regarding the term 'veteran'	Noted	NFA
Definition	Query that the definition of Mariner which relates to 'ships' excludes the veterans serving as submariners on Submarines	Noted	NFA
Definition	Suggests you must have served in a war zone or a peace keeping environment to be defined a veteran	Noted	NFA
Dependant Benefits	Funeral allowance - Reimbursement model puts up front pressure on families	Wherever practical, the families of deceased veterans can direct DVA can pay the cost of a funeral to either the person who carried out the funeral or any other person who incurred the cost of the funeral (section 268)	For administration consideration
Dependant Benefits	The Queensland Government does not recognise the term Wholly Dependent Partner for the State Government rebates and is declining War Widows/ers entitlements. I urge that the use of the term 'Wholly Dependent Partner' be removed from MRCA and replaced with 'War Widow/er'.	The setting of concessions is outside the scope of the reform work underway	For future consideration
Dependant Benefits	VEA auto-granting of entitlements under new arrangements	Arrangements to be retained under the MRCA for the families of veterans in these categories.	NFA

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Dependant Benefits	I believe it would be beneficial if benefits for children that are assessed as eligible young persons was extended to include the provision of a Gold Card until they enter full time employment or reach the age of 18.	Coverage being extended under revised arrangements	NFA
Dependant Benefits	Changes to benefits for the families of VEA veterans	MRCA coverage being expanded to the families of deceased VEA veterans	NFA
Dependant Benefits	Gold Card eligibiity for dependants of deceased and EDA veterans. Veteran was grateful for DVA's prompt response on this issue.	Noted	NFA
DRCA veterans	The proposed MRCA threshold test will prevent DRCA-eligible veterans accessing certain benefits, particularly the Gold Card.	Noted.	NFA.
DRCA veterans	Calling for retrospective Gold Card eligibility for DRCA widows.	Noted.	NFA.
DRCA veterans	Application of SoPs to current DRCA veterans is 'unfair'.	SoPs are underpinned by sound medical scientific evidence, and are acknowledged as providing consistency and certainty for claimants and delegates.	NFA.
DRCA veterans	Application of SoPs to current DRCA veterans is 'unfair'.	SoPs are underpinned by sound medical scientific evidence, and are acknowledged as providing consistency and certainty for claimants and delegates.	NFA.
DRCA veterans	Worsening of DRCA-accepted conditions should be assessed under existing DRCA arrangements.	Noted.	NFA.
Education Schemes	I would like to see the education monies that are available to people under MRCA made available to all veterans.	Coverage being extended under revised arrangements	NFA
Financial advice	Increased demand for financial advice, compounded by the higher costs of these services.	Noted.	
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Funeral allowance	Inequity between MRCA/VEA reimbursement amounts	MRCA eligibility being extended to VEA families in auto-grant categories and where death(s) are related to service	NFA
Funeral benefits	That there is no indexation of funeral benefits under the VEA.	Noted.	For later consideration.
General	Request for primary level claims to be examined more 'beneficially' without having to go to review	Noted	For administration consideration
General	GST tax exemption for motor vehicle purchase only applies to TPI, not EDA	MRCA rules to apply under new arrangements	For later consideration
General	Request to increase the cost(s) available to veterans for obtaining financial advice	Noted	For later consideration
General	Request to reconsider certain elements within the current support system, including: 1. Providing ex-partners with lifelong service pensions. 2. Changing 'Defence housing' to 'Defence and Veteran Housing' to allow increased support for non-serving families. 3. Change dependant children age for those with disabilities. 4. Improve training for DVA phone staff. 5. Provide adequate staff members in DVA locations to enable face-to-face meetings to answer queries from families.	Noted	For later consideration
General	Job application (unrelated to reform/Bill)	N/A	NFA
General	Coverage for Reservists	Coverage for Reservists exists under current arrangements and will continue under the single ongoing Act model	NFA
General	Comments on the Royal Commission's recommendations	Noted	NFA
General	Comments that the system needs to be better designed to support long-serving members rather than providing large payouts to junior members injured early employment	Noted	NFA
General	Concerns with current system and comment(s) that representation should not be required during the claims process	Noted	NFA
General	Concerns with progress of implementing Royal Commission recommendations	Noted	NFA

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General	Criticism with Government processes which see veterans being celebrated for their roles	Noted	NFA
General	Equal benefits should be available for all veterans	Noted	NFA
General	General criticism of reform process	Noted	NFA
General	Submission used as a vehicle to deliver political views on unrelated matters	Noted	NFA
General	Need for transparency in reform	Noted	NFA
General	The texts of Veterans legislation and explanatory materials should be readily comprehensible by lay people seeking to understand their entitlements and options	Noted	NFA
General	General submissions highlighting complexities of the current system and lack of support for those with co erage under earlier Acts	Noted - The reform work underway is a step towards standardising the supports for all veterans' groups	NFA
General	The common-law damages upper limit will be irrelevant when compared with MRCA liability.	Noted.	NFA
General	Request that all ADF members and veterans receive the same entitlements	Noted. This is a core element of the reform.	NFA
General	Request to use rent assisance provided by the ADF for mortgage payments	This issue is outside of the scope of current reform work	NFA
General	Requests that if a veteran is eligible for DVA disability payments that they should automatically receive (Centrelink) disability support payments.	Out of scope	NFA
General	Case-specific questions	Noted	Refer to claims area
General	All new claims should be assessed as new claim not lumped into previous claim determinations. Times taking to process is too long.	Noted	For administration consideration
General	Comment regarding assistance to help veterans gain secure housing by allowing Gold card recipients to access Dohas	Noted	For later consideration
General	I have a DVA White Card. Why can't I just swipe my card whenever I need treatment for an accepted injury?	Noted	For later consideration

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General	Guarantee that existing conditions and entitlements to medical treatment are 'grandfathered and Review the requirement for Psychiatrists to review mental health conditions.	Noted. Further consideration to be given to the need for psychiatrists to diagnose MH conditons	For policy consideration
General	Section 80 - Recommend that a third-party oversight to ensure compensation reaches the children as intended.	Payments will be directed to the primary carer.	For policy consideration
General	Keen to see what further supports are availavle under the new framework	Noted	NFA
General	DRCA currently provides no monetary compensation for those who have recognized service related Tinnitus. As I have not claimed through the DRCA scheme for these impairments, will the legislated reform allow me to claim compensation through the new MRCA.	All new IL claims will be considered under the MRCA	NFA
General	Suggests the extension of veterans' eligibility criteria for income support extended to include members of the Australian Public Service who have served as members of ADF operational deployments in warlike and peacekeeping missions.	Current provisions to remain	NFA
General	Requests information on how the new legislation will affect their personal situation	Examples addressed via consultation information/scenarios	NFA
General	How will the Bill care for Veterans with complex needs?	Existing DRCA and VEA comp to be grandparented with new claims to be assessed under the improved MRCA.	NFA
General	My wife and I do not want to change from our fortnightly payments, and we want to stay as it is, and not have all this stress and worry about what you are trying to do.	Existing DRCA and VEA comp to be grandparented with only new claims to be assessed under the MRCA.	NFA
General	A definition of the MRCA eligibility test for current DRCA veterans would be great	Issues addressed via consultation information/scenarios	NFA
General	Comment regarding higher compensation payments	MRCA provisions to remian	NFA
General	All ex serving veterans should have access to hearing services through Australian Hearing at no cost to themselves.	Noted	NFA
General	Hire a small team of Customer support officers to update veterans on their claim.	Noted	NFA

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General	Increase the weekly maximum amount for Household Services to a higher amount.	Noted	NFA
General	A key aspect must be a 'no detriment' clause, to ensure veterans will not be adversely impacted by the changes.	Noted	NFA
General	Comment that reform will not benefit veterans	Noted	NFA
General	Does not support the current model	Noted	NFA
General	Doesn't support the new legislation	Noted	NFA
General	Ex firefighters (adf) compensation for contamination by afff foam.	Noted	NFA
General	Not supportive of the new model	Noted	NFA
General	Not supportive of the new or old model	Noted	NFA
General	Not supportive of the old model	Noted	NFA
General	Not supportive of the old model .	Noted	NFA
General	Overwhelmed by the amount of paperwork and information required	Noted	NFA
General	Support for current system (but welcomes greater simplification)	Noted	NFA
General	There needs to be a clause or provision that no veteran will ever be worse off under the new legislation.	Noted	NFA
General	Requests clarification as to whether this Bill will ensure compensation for the trauma they suffered	Case specific query	Check whether case was referred for follow-up response
General	Hearing about other people's mental illness on the daily is exhausting. Everyone relates everything to mental illness, and Defence has enabled this to happen.	Noted	NFA
General	Suggests creation of a new public service voucher covering housing food and healthcare costs this public service vouch would be in linked to a member credit card allowing a hex loan to help cover theses cost	Noted	NFA

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General	Concerned how the new model will affect their specific situation	Case specific query	Check whether case was referred for follow-up response
General	Reports unable to load submission for consultation	N/A	NFA
Gold Cards	Expand Gold Card eligibility to veterans aged 70, irrespective of circumstance	Noted	For later consideration
Gold Cards	Treatment cards for DRCA veterans	Access to Gold Cards to be expanded under revised arrangements	NFA
Gold Cards	Request for Gold Cards to be made available to spouses once the veteran dies	Already available under the MRCA for service-caused deaths and where certain other criteria are met	NFA
Gold Cards	Lack of Gold Cards fro DRCA service	Coverage being expanded under MRCA	NFA
Gold Cards	Request for Gold Cards for those with National Service during Vietnam	Current arrangements to continue - Those with National Service in Vietnamese operational areas have the same access to VEA benefits as other veterans. Others who complete a specified period of peacetime service on or after 7 December 1972 will also be eligible under the VEA.	NFA
Gold Cards	Request for Gold Cards for all veterans who served in operational areas	Current MRCA arrangements to apply	NFA
Gold Cards	DRCA Gold Card eligibility	Eligibility being expanded to include DRCA cohorts	NFA
Gold Cards	Gold Card eligibility for DRCA veterans	Eligibility being expanded to include DRCA cohorts	NFA
Gold Cards	Automatic granting of Gold Cards for DRCA veterans with 80+ impairment points	Eligibility to be expanded for DRCA veterans under the single ongoing Act, subject to meeting the MRCA assessment threshold(s)	NFA
Gold Cards	Any member who has done 30 years should be able to access a Gold card.	MRCA provisions to remian	NFA

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Gold Cards	Better targeted eligibility for Gold Cards (service pension at 60, automatic G/C eligibility at 70)	MRCA provisions to remain	NFA
Gold Cards	That all ex service persons who served in the ADF over the age of 75, be offered a Gold Card.	MRCA provisions to remain	NFA
Gold Cards	Gold Card should be provided to all veterans, irrespective of service type	Noted	NFA
Gold Cards	Gold Cards for DRCA veterans	Noted	NFA
Gold Cards	Provision of Gold Cards based on length of service	Noted	NFA
Gold Cards	Suggestion to allow gold cards prior to veteran reaching the eligible impairment points	Noted	NFA
Gold Cards	Better targeted eligibility for Gold Cards (service pension at 60, automatic G/C eligibility at 70) and preventative procedures should be included in NLHC.	Noted	NFA
Gold Cards	Gold Card Considerations for veterans who reach 70 and haven't deployed	Noted	NFA
Gold Cards	If you have a Gold Card Dental treatment must be covered in all aspects. It is so hard to gain support for the need of anaesthesia due to the current legislation.	Noted	NFA
Gold Cards	Eligibility for existing DRCA veteran	Threshold test is required	NFA
Gold Cards	Request for Gold Cards for all veterans who have the points required under DRCA	Coverage being extended under revised arrangements	NFA
Gold Cards	Gold card for all veterans that have been deployed	MRCA model to apply	NFA
Gold Cards	Better targeted eligibility for Gold Cards (service pension at 60, automatic G/C eligibility at 70)	MRCA provisions to remain	NFA
Gold Cards	Targeted DRCA eligibility for Gold Cards	Noted	NFA
Gold Cards	Gold Card considerations for veterans who have had traumatic service outside warlike.	Noted	NFA
Gold Cards	Gold cards for all veterans with national service	Noted	NFA
Gold Cards	Gold cards for all veterans with operational service	Noted	NFA
Gold Cards	Review of conditions governing the provision of a Gold Card.	Noted	NFA

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Gold Cards	Suggestion to give every member a gold card and cover medical expenses thereby eliminating the backlog and eliminating a need for DVA to exist	Noted	NFA
Gold Cards	Better targeted eligibility for Gold Cards (service pension at 60, automatic G/C eligibility at 70)	Noted - MRCA criteria to remain	NFA
Governance	Comment that reform will not benefit veterans	Noted	NFA
Governance	Criticism with Government's role in their reform process and suggestions that it is primarily an exercise in cost-cutting	Noted	NFA
Governance	Legislation must have effective accountability mechanisms to address any misconduct in defence	Noted. The legislation does not cover this beyond providing information to Defence on claims. The increase to the common law damages cap also serves in this regard.	NFA
Governance	Requests an independent Board of Directors comprised of everyday citizens to oversee the development of this legislation.	Noted	NFA
Household Services	Discrepancies between benefits under Veterans' Home Care and Household Services.	Access to VHC to be retained.	NFA.
Household Services	Discrepancies between benefits under Veterans' Home Care and Household Services.	Access to VHC to be retained.	NFA.
Household services	Is a widow's loss of eligibility for household services upon the death of their veteran partner attributable to a re-assessment of eligibility?	Administration of Income Support Supplement and service pension will remain unchanged.	NFA
Household Services	Increase the maximum statutory limit for the provision of these services	Noted	For later consideration
Household Services	Concerns that veterans accessing services via Veterans' Home Care (VHC) will be disadvantaged under the MRCA	Access to VHC to be retained	NFA
Household Services	The solution, make available Household Services to Veterans' under the VEA.	HHS to become available to all eligible veterans	NFA
Implementation	Suggests a 'No detriment' provision for claimants who apply under existing framework.	Noted. S424 operates to provide some protection.	For policy consideration.
Implementation	Suggests a 'No detriment' provision for claimants who apply under existing framework.	Noted. S424 operates to provide some protection.	For policy consideration.

**Thematic Analysis of Submission Received on the Exposure Draft of the
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Implementation	Delayed implementation will continue the need for extended knowledge/training requirements for DVA staff, advocates and veterans.	This is a known consideration.	NFA.
Implementation	Highlighted the need to manage spikes in inquiries and claims, by DVA staff, advocates and veterans.	This is a known consideration.	NFA.
Implementation	Adequate levels of training and support need to be made available to advocates and legal groups on the transitional implications for veterans and their families	Noted	For administration consideration
Implementation	The Government needs to ensure that an appropriate transition plan is in place for veterans, families, advocates, etc.	Noted (and agreed)	For administration consideration
Implementation	The veterans entitlement treatment support (VETS) bill should not go before government before the final recommendations from the Royal Commission have been provided.	noted	NFA
Implementation	Requests an independent Board of Directors comprised of everyday citizens to oversee the development of this legislation.	Noted	NFA
Incapacity Payments	Calculation of Reservist earnings	Noted - Question related to current policies, unrelated to reform work	For policy consideration
Incapacity Payments	Concerns with the transition of DRCA incap recipients to MRCA	Noted	NFA
Incapacity Payments	Indexation of DRCA incapacity payments by WPI	Noted	NFA
Incapacity Payments	Incorporate superannuation payments into incapacity payments	Noted - MRCA criteria to remain	NFA
Incapacity Payments	Consideration for any veteran that qualifies for a Class A pension and hits enough PI points for a TPI Gold Card should be afforded 100% of their salary at time of discharge. Not dropped to 75%	Current MRCA arrangements to apply	NFA
Indexation	Concerns with different indexation methodologies between ADA and 'Above General Rate' pensions under the VEA	Noted	
Information sharing	Request to link Defence eHealth System with DVA	Information sharing processes between DVA/Defence are currently under consideration	For further consideration

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Information sharing	Shared Defence/DVA medical health profile for use by DVA/Defence	Information sharing processes between DVA/Defence are currently under consideration	For further consideration
Information sharing	Information-sharing privacy provisions need to be enhanced to avoid a repeat of circumstances such as MATES.	Noted.	NFA
Information Sharing	Once an ADF Member separates from full time service - their DVA file should already be pre-populated with all injuries or diseases diagnosed during their ADF service that have presumptive liability.	Information sharing processes between DVA/Defence are currently under consideration	For further consideration
Information Sharing	Portable ADF service records and evidence of ADF service	Information sharing processes between DVA/Defence are currently under consideration	For further consideration
Legislation	Grandparenting' will add 40-50 years to current entitlements	All new claims from 1 July 2026 will be covered under the MRCA. The grandparenting arrangements were included to ensure continuity of support until such time as a new claim is lodged.	NFA
Legislation	Concerns regarding the delay in commencement from 2025-2026	Noted	NFA
Legislation	Concerns regarding the delay in implementation	Noted	NFA
Legislation	Update wording in Schedule 2, Sections 32 and 33 from 'Victoria Cross of Australia' to 'Victoria Cross for Australia'.	Noted	NFA
Legislation	Will the Bill be retrospective in application?	Subject to passage of the Bill, the changes will apply to new claims from 1 July 2026 (with the exception of single review pathway, which will commence 60 days from Royal Assent)	NFA
Liability	The precise date of clinical onset is often difficult to establish, and should be clarified.	Known policy issue.	For policy consideration
Liability	Psychologist to diagnose mental health condition rather than having to wait for a full psychiatrist report	Noted. Further consideration to be given to the need for psychiatrists to diagnose MH conditons	For policy consideration

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Liability	Change to onus of proof which requires veterans to prove causation	Noted. The onus sits on the Commission.	For policy consideration
Liability	Request for a single standard of proof (per the Productivity Commission recommendation)	BoP and RH standards to be retained under the MRCA	NFA
Liability	Request for single standard of proof	Dual standards within the SoPs are a longstanding feature of DVA's assessment framework. The distinction based on service type(s) was retained when the MRCA was developed and continues to be supported.	NFA
Liability	Concerns with factors contained in the current suite of SoPs	Noted	NFA
Liability	Consider how service types are classified. The current (BoP/RH) model diminishes certain service	Noted	NFA
Liability	Request to modify SoPs to include factor(s) for submariners in Vietnamese waters during the 1980s	Noted	NFA
Liability	SoPs are not fit for purpose; standards of proof are confusing; SOP factors are difficult to meet; SOP reviews take inordinately long.	Noted. SoPs are underpinned by sound medical scientific evidence, and are acknowledged as providing consistency and certainty for claimants and delegates.	NFA
Lump sums	Will a lump sum be calculated to the date of the veteran's death, not to the expected life expectancy of the veteran?	The lump sum will be calculated to the date that the veteran <i>would have been in payment</i> , but for their death, in other words to their estimated life expectancy.	NFA
N/A	No submission attached	Noted	NFA
N/A	Submission not saved into HP Content	N/A	NFA
N/A	No submission attached except one page article - The Battlefield Back Home	N/A	NFA
N/A	Link to submission doesn't work	N/A	NFA
N/A	Submission not attached	N/A	NFA
N/A	Submission aimed at working with DVA on wellness activities for veterans	N/A	NFA

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National Service	National service to be given an operational name Award anniversary of National Service Medal. Review application of "nature of service"	Current arrangements to continue - Those with National Service in Vietnamese operational areas have the same access to VEA benefits as other veterans. Others who complete a specified period of peacetime service on or after 7 December 1972 will also be eligible under the VEA.	NFA
National Service	Please include 65-72 Nashos in Non-Liability Health Care.	Current arrangements to continue - Those with National Service in Vietnamese operational areas have the same access to VEA benefits as other veterans. Others who complete a specified period of peacetime service on or after 7 December 1972 will also be eligible under the VEA.	NFA
National Service	While the improvements are splendid they fail to address the discrimination against National Servicemen who did not serve overseas.	Current arrangements to continue - Those with National Service in Vietnamese operational areas have the same access to VEA benefits as other veterans. Others who complete a specified period of peacetime service on or after 7 December 1972 will also be eligible under the VEA.	NFA
Nature of Service	Classification of Malaysia service in 1955	Nature of service classifications are via Defence determination and outside of DVA's remit	NFA
Nature of Service	Classification of Malaysia as an operational area between 1968-89	Nature of service classifications are via Defence determination and outside of DVA's remit	NFA
Nature of Service	Concern with list of peacekeeping operations in new MRCA 6A	Nature of service classifications are via Defence determination and outside of DVA's remit	NFA

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Nature of Service	How will 'peacekeeping' service be dealt with under new arrangements (for AFP, etc)	New subsection 6A being included in the MRCA to reflect the types of peacekeeping service covered under the Act	NFA
Nature of Service	The bill should provide clarity about coverage on duty or on exercise or on deployment.	Noted. 'Injury on duty' will partly ameliorate this concern.	NFA
Nature of service	A person who enlists for a period of 9 years or greater should be regarded a veteran.	Noted	NFA
NLHC	There is no extension of NLHC eligibility to reservists.	Noted. Coverage for Reservists under current arrangements and will continue under the single ongoing Act model.	For later consideration.
NLHC	I find no reference to Non-Liability Health Care in the draft legislation. I am still concerned that if or when it is included it will discriminate against servicemen from different eras.	Current NLHC eligibility rules to continue to apply	NFA
Offsetting	Opposed to offsetting requirements.	The modern structure of the MRCA already includes benefits subject to the offsetting of Commonwealth-funded components of superannuation, in contrast to VEA benefits which were designed when superannuation was limited and most ADF members served only for a period of a conflict or for a short term.	NFA.
Offsetting	Concerns with how offsetting will apply under the new arrangements	The offsetting provisions/requirements as currently prescribed for MRCA claims will continue to apply	For later consideration
Offsetting	Discretion for delegates to consider individual circumstances when recovering compensation	While DVA has a general obligation to recover all overpayment(s) of compensation, delegates have discretion to assess the financial circumstances of the individual and consider how that recovery occurs	NFA

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Offsetting	Concerns regarding Offsetting rules	Provisions restricting being compensated twice to remain appropriate	NFA
Offsetting	Offsetting arrangements need to be clearly articulated to veterans	Noted	NFA
Offsetting	Once the lump sum is recovered, the pension should revert to normal.	Noted	NFA
Overpayments	Debt/overpayment recovery administration should reflect findings from the ROBODEBT Royal Commission.	Noted.	For policy consideration.
Overpayments	Any changes to recovery arrangements?	There are no planned changes to existing debt-recovery process; grandparenting and indexation of current payments will ensure no reduction in the levels of payments.	NFA
Payments to dependants	Whether a bereaved partner who accepts a DRCA lump sum can access Income Support Supplement at a higher ceiling rate.	Administration of Income Support Supplement and service pension will remain unchanged.	NFA
Permanent Impairment	Embedding of the whole-of-person approach to permanent impairment is not supported.	Noted.	NFA.
Permanent Impairment	Embedding of the whole-of-person approach to permanent impairment is not supported.	Noted.	NFA.
Permanent Impairment	Potential for lump sum benefits to be mismanaged, with potential harmful consequences for veterans' mental health and financial situation.	Noted.	For policy consideration.
Permanent Impairment	Potential for lump sum benefits to be mismanaged, with potential harmful consequences for veterans' mental health and financial situation.	Noted.	For policy consideration.
Permanent Impairment	Noted the risk of providing lump sums to veterans with substance misuse issues	Legislation will allow greater engagement by Commission	For policy consideration
Permanent Impairment	Section 80 payment should be linked to age, not number of children	Noted	For policy consideration
Permanent Impairment	Concerns that the MRCA's whole-of-person assessment model doesn't allow the full extent of an individual's impairments to be reflected	MRCA model remains appropriate and ensures a veteran can only be assessed with a maximum of 100% functional loss	NFA

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Permanent Impairment	Use of medical 'panel' for diagnosis and assessment of impairment	Noted	NFA
Permanent Impairment	Date of Effect changes lack clarity.	Noted.	NFA
Permanent Impairment	Concerns regarding eligibility for payments under section 80 of the MRCA	Payments under section 80 will be available subject to meeting the 'MRCA threshold' test for a 5 impairment point worsening (or acceptance of new IL claim), as well as having the impairment(s) assessed at 80+ impairment points under the Guide to Determining Impairment and Compensation.	NFA
Permanent Impairment	Request for modifications to section 80 provisions to pay directly to the dependant child or carer	Payments will be directed to the primary carer.	NFA
Permanent Impairment	MRCA should have an option for increase in their pension should their conditions worsen.	Current MRCA arrangements to apply	NFA
PI	Drafting issues for VEA veterans being assessed under the MRCA PI provisions	Noted	
Presumptive Liability	Defence to provide summary of tasks and employment conditions for all trades/jobs within Defence to DVA to support claims process	DVA has explored this issue and adopted a similar approach to support 'decision-ready' claims processes	NFA
Presumptive Liability	Add-on to earlier submission, noting occupational exposure to asbestos lagging during service	Noted	NFA
Presumptive Liability	Opportunities to refine the proposed Presumptive Liability provisions	Noted	NFA
Presumptive Liability	Request for expansion of the proposed list of presumptive liability conditions to better reflect the rigours of ADF service	Noted	NFA
Presumptive Liability	Will presumptive liability be applied to all veterans under the new model?	Noted	NFA
Presumptive Liability	Question about whether the current list of 'streamlined' conditions will be included under new presumptive liability arrangements	Yes - The Instrument will include those already identified under decision-ready policies	NFA

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Presumptive Liability	Query regarding how the new legislation will take into account F-111 fuel maintenance workers	The unique arrangements for ADF Firefighters and F-111 Deseal/Reseal workers will be transferred into the MRCA.	NFA
Presumptive Liability	Presumptive liability is a great inclusion, but will depend on what conditions are added.	Noted	NFA
Presumptive Liability	Supportive of presumptive liability	Noted	NFA
Presumptive Liability	Unless the Commission can prove otherwise, any disease or injury during, or arising from, Service, must be accepted.	Noted	NFA
Procedures	Comment regarding why multiple medical documents are required	Noted	NFA
Procedures	Propose simplified documentation for GPs to complete	Being addressed via broader reform model	NFA
Procedures	Request to index pension fairly, at least with CPI. PI to be done through an annual phone call.	Noted	NFA
Rehabilitation	Comment regarding Veterans should receive similar benefits as those of NDIS.	Noted	NFA
Rehabilitation	The RAP schedule for to be in line with NDIS	Noted	NFA
Rehabilitation	For consideration- regarding Physio for an accepted condition - remove the requirement to supply a business address. I would then be able to use all 12 sessions without having to continually go back to my doctor for a new referral.	Noted	NFA
Reservists	Suggests a review of Reservist eligibility be undertaken to ensure those that have served in whatever capacity can access the services and supports they are entitled to.	Noted	NFA
Resources	Reduce the time frames for approving claims. If this involves hiring more staff, then do it.	Processes being streamlined under revised arrangements	NFA
Resources	When will DVA be given more resources to deal with the back log of claims.	Processes being streamlined under revised arrangements	NFA
Review	Recommends an oversight body for DVA to look at the behaviour and performance of politicians and their staff where complaints like this can be made public.	Noted	NFA

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Review	Recommends a review to be done on the performance and efficacy of the law, with the report of the review laid before the Parliament by a date that is seven years after Royal Assent.	Noted	NFA
Review	Suggests that funding be provided to veterans to independently legally challenge decisions made by DVA.	Noted	NFA
Review processes	Concerns that legal representation not permitted at VRB hearings	No changes to this arrangement - VRB hearings are deliberately intended to be non-adversarial and supportive of the veteran	NFA
Review processes	Request clarification on what will occur with matters currently with the VRB on the date of implementation of the new Act.	No changes to this arrangement - VRB hearings will continue that are already in motion	NFA
Review processes	Request to allow representation at VRB reviews	Noted	NFA
Review processes	Single Review Pathway should not exclude lawyers.	Noted.	NFA
Review processes	Costs incurred by veteran having to attend the AAT	Review pathway being modified to ensure all veterans to access the Veterans' Review Board and Alternative Dispute Resolution processes (without the need for legal representation)	NFA
Service	The Special Ops period is outside the period mentioned above. So in order to avoid confusion it would be sensible to include the Special Ops periods within the Operational Areas. It must be remembered that Vietnam was not the only geographical area that Special Ops went to.	Nature of service classifications are via Defence determination and outside of DVA's remit	NFA
Service	Suggeste If veteran served overseas they should be entitled to lifetime support.	Noted	NFA
Service	Suggests granting of TPI for DRCA cohort	MRCA model to apply (including SRDP and eligibility for incap if of working age	NFA

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Service	Operational service on the Thai/Malay Border to include 1969 to 1971.	Nature of service classifications are via Defence determination and outside of DVA's remit	NFA
Service differential	The removal of the service differential should reflect the changed natures of conflict, service and force structures - 'an injury is an injury'.	The Government's Legislation Reform Pathway listed the Productivity Commission's recommendations 8.4 and 14.1 (which proposed a single standard of proof and a single rate of permanent impairment payment) as being 'not progressed'.	NFA.
Service differential	The removal of the service differential should reflect the changed natures of conflict, service and force structures - 'an injury is an injury'.	The Government's Legislation Reform Pathway listed the Productivity Commission's recommendations 8.4 and 14.1 (which proposed a single standard of proof and a single rate of permanent impairment payment) as being 'not progressed'.	NFA.
Service differential	The removal of the service differential should reflect the changed natures of conflict, service and force structures - 'an injury is an injury'.	The Government's Legislation Reform Pathway listed the Productivity Commission's recommendations 8.4 and 14.1 (which proposed a single standard of proof and a single rate of permanent impairment payment) as being 'not progressed'.	NFA.
Service differential	The removal of the service differential should reflect the changed natures of conflict, service and force structures - 'an injury is an injury'.	The Government's Legislation Reform Pathway listed the Productivity Commission's recommendations 8.4 and 14.1 (which proposed a single standard of proof and a single rate of permanent impairment payment) as being 'not progressed'.	NFA.

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Service differential	The removal of the service differential should reflect the changed natures of conflict, service and force structures - 'an injury is an injury'.	The Government's Legislation Reform Pathway listed the Productivity Commission's recommendations 8.4 and 14.1 (which proposed a single standard of proof and a single rate of permanent impairment payment) as being 'not progressed'.	NFA.
SoPs	What is the prevalence of dispute with DVA stemming from the different standards or proof and a strict interpretation of SoPs?	Decisions being set aside on the basis of "Incorrect application of SoP" occur in 4-6% of cases.	NFA
SoPs	The prevalence of claims being rejected on the basis of the relevant SoP, where medical evidence pointed to a connection to service?	The SoP system is robust and effective, one that promotes consistency, predictability and transparency and draws a clear line between accepted and non-accepted conditions, based on sound medical-scientific evidence.	NFA
SoPs	Could s.340 be used more often, to employ Commission-made SoPs?	This provision has never been used under the MRCA (and only once under the VEA).	Consideration will be given to the operation of S.340 in the lead-up to commencement of the single ongoing Act.
SRDP	Eligibility for veterans receiving DRCA incapacity payments	Coverage being extended under revised arrangements	NFA
SRDP	Review of SRDP payments	MRCA model remains appropriate	NFA
SRDP	Discrepancy between TPI and SRDP being income and assets tests.	Noted	NFA
Superannuation	Rate of superannuation payments	Noted	NFA
Support	Support for current system (but welcomes greater simplification)	Noted	NFA
Support	Support for reform process	Noted	NFA

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Support	Support for reforms aimed at reducing rates of suicidality amongst veterans	Noted	NFA
Support	Support for single-ongoing Act proposal and inclusion of grandparenting provisions	Noted	NFA
Support	Support for the single ongoing Act model (and MRCA enhancements)	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Supportive of having one Act, not Three	Noted	NFA
Support	Supportive of reform work underway. Suggestions for DVA claims processes	Noted	NFA
Support	Welcomed (and supported) the recommendations from the Royal Commission.	Noted	NFA
Support	Supports revised wording regarding payment to solicitor's trust account.	Noted.	NFA
Support	Support for single-ongoing Act proposal and inclusion of grandparenting provisions	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Support for single-ongoing Act proposal and inclusion of grandparenting provisions	noted	NFA
Support	I support the suggested changes that the Simplification and Harmonisation Bill 2024. My wish is for parliament to support the changes.	Noted	NFA
Support	I welcome the unification of the Acts as part of simplifying this most stressful and cumbersome process.	Noted	NFA
Support	Very much like the changes, when things a simpler it easier.	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	noted	NFA
Support	Support for single-ongoing Act proposal and inclusion of grandparenting provisions	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA

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Support	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Terminology	The definition of dependence, particularly the need to be economically dependent, has not kept pace with today's family structures and circumstances, and the need to recognise service-caused relationship breakdowns.	Noted.	For later consideration.
Terminology	Legislation and benefits generally have not kept pace with today's family structures and circumstances.	Noted.	For later consideration.
Terminology	Replacement of 'war widow' with 'wholly dependant partner' is inappropriate.	Noted.	For later consideration.
Terminology	Replacement of 'war widow' with 'wholly dependant partner' is inappropriate.	Noted.	For later consideration.
Terminology	The bill does not sufficiently recognise the uniqueness of ADF service.	Noted.	NFA.
Terminology	Definition of a Legal Personal Representative needs to reflect the complexities of personal relationships.	Noted.	For later consideration.
Threshold test	Comment that all Veterans should be put on new legislation in one hit.	Eligibility to be expanded for DRCA and VEA veterans under the single ongoing Act, subject to meeting the MRCA assessment threshold(s)	NFA
TPI	TPI eligibility under revised model	Issues addressed via consultation information/scenarios	NFA
TPI	Future eligibility for TPI being closed off	MRCA model to apply (including SRDP and eligibility for incap if of working age)	NFA
TPI	Concerns that TPI eligibility is being removed under the new model	TPI will be closed to new veterans but other supports will be made available under the MRCA such as SRDP and incapacity payments (if of working age)	NFA
TPI	Veterans prevented from claiming TPI following introduction of new arrangements	TPI will be closed to new veterans but other supports will be made available under the MRCA such as SRDP and incapacity payments (if of working age)	NFA

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TPI	Your explanations on the Act and in the Website does not address the current TPI veteran, which only adds to the stress Veterans are already subject to worrying about their entitlements.	Issues addressed via consultation information/scenarios	NFA
TPI	Concerns regarding TPI being replaced by SRDP.	Noted	NFA
TPI	Supportive of attempts to harmonise veterans' legislation	Noted	NFA
Training	Request for face to face information sessions	Noted	NFA
Transition	Observation that current system is in crisis and is set up to put veterans on incapacity payments. Suggesting a three month 'transition' payment for veterans discharging before a focus on return to work. The system should be looking to sever the reliance on long term support. Other suggestions are to improve employer incentives, start to accept conditions automatically and shift rehab focus to recovery	Noted	For later consideration
Transition	Improving Rehabilitation and Transition into Employment and longer term outcomes.	Noted	NFA
Transport	Veterans that have war-like service be provided free public transport for life.	Existing provisions contained in Chapter 6, Part 4 of the MRCA remain appropriate	NFA
Transport	My sport physio service falls under Allied Health Services which DVA transport don't cover. I believe this needs to be included so I can have arranged DVA transport which allows me to get to my appointment and get me back home.	Existing provisions contained in Chapter 6, Part 4 of the MRCA remain appropriate	NFA
Transport	The private vehicle km rate is not covering fuel costs and wear and tear.	Changes proposed for 1 July 2026 will remove the 50 kilometre round-trip minimum distance requirements and payments for all veterans will be paid at the higher (MRCA) rate	NFA
Travel allowance	Rates of travel allowance should align with Australian Public Service rates.	Noted.	For later consideration.
Travel Allowance	Rates of travel allowance should align with Australian Public Service rates.	Noted.	For later consideration.

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Travel entitlements	Does DVA pay travel entitlements at the Australian Taxation Office rate?	The rates for travel allowances are aligned with those used under the <i>Safety, Rehabilitation and Compensation Act 1988</i> .	NFA
Treatment	Issues raised in the submission appear to relate to medical treatment but are largely indistinguishable beyond that (references to a 'broken system')	Noted	NFA
Treatment	Support for PAMT/automated assessment approvals	Noted	For later consideration
Treatment	Lack of access to NLHC for cancer for National Service undertaken in 1964	Current NLHC eligibility rules to continue to apply	NFA
Treatment	Extension of transport provisions to include GP,Optical, Physio,Dental appointments	Existing provisions contained in Chapter 6, Part 4 of the MRCA remain appropriate	NFA
Treatment	Embossing of treatment cards for intermediate rate vs TPI	MRCA embossing rules to apply ('TPI' embossing for SRDP-eligible veterans and 'EDA' embossing for ADA eligibility)	NFA
Treatment	Expand the list of treatments able to be accessed beyond those prescribed in the MBS	Noted	NFA
Treatment	Pesumptive Liability is supported, but also recommends additional conditions to be covered under PAMT.	Noted	NFA
Treatment	Request to include treatment on the list of reviewable decisions under the MRCA	Treatment decisions are already reviewable under the MRCA	NFA
Vehicle assistance	No appeal provisions for Vehicle Assistance Scheme claims.	Noted. Vehicle assistance arrangements will be harmonised and consolidated under the MRCA, with decisions reviewable by the Commission.	NFA.
VRB	The VRB should be made by a real independent statutory authority seperate from the influence of the Department of Veterans' Affairs.	No changes to this arrangement - VRB hearings are deliberately intended to be non-adversarial and supportive of the veteran	NFA

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Wellbeing	The current system encourages me to be more broken, not less. I get a Class B and if I reach another benchmark I get a Class A. I believe we need to do away with this, as it drives people to demonstrate they're more broken in order to access more points towards this benchmark.	Noted	NFA
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