
From: [REDACTED]
Sent: Saturday, 29 June 2019 4:12 PM
To: medboardconsultation
Subject: Fwd: Consultation on complementary and unconventional medicine and emerging treatments

----- Forwarded message -----

From: Our Choice <contact@ourchoice.org.au>
Date: 29 Jun. 2019 4:10 pm
Subject: Consultation on complementary and unconventional medicine and emerging treatments
To: [REDACTED]
Cc:

I choose Option 1. I am happy with my GP for simple treatments within brief consultations, but I want to go further in investigating all causes for underlying health issues I have that have not been addressed by my GP. I prefer non-drug approaches for managing my family's and my own health or illnesses. I have the right to freedom of choice on how I want to manage my own health.

I have concerns about the proposed regulations because there has been no transparency in consultation process. Freedom of Information requests as to how these proposals originated have been denied or redacted.

From: [REDACTED]
Sent: Sunday, 30 June 2019 6:15 PM
To: medboardconsultation
Cc: [REDACTED]
Subject: Fwd: Consultation on complementary and unconventional medicine and emerging treatments

CONFIDENTIAL. Please remove name and identifying factors when publishing

Begin forwarded message:

From: Our Choice <contact@ourchoice.org.au>
Subject: Consultation on complementary and unconventional medicine and emerging treatments
Date: 30 June 2019 at 5:39:53 pm ACST
To: [REDACTED]
Reply-To: [REDACTED]

I choose Option 1: "no new regulations are required for doctors practising in the areas of complementary medicine and integrative medicine."

Dear Sir / Madam;

Thank you for the opportunity to provide feedback to the Medical Board of Australia's [MBA] Public consultation on clearer regulation of medical practitioners who provide complementary and unconventional medicine and emerging treatments.

CONCERNS

I am writing to express my deep concern at the MBA's proposal which will implement changes and restrictions in health care choice for Australian patients, the way General Practitioners and specialists are permitted to practice and consult, and have huge ramifications for both the future development of health care and the access of the community to these essential health services.

To introduce The MBA's proposals would put the MBA on the wrong side of history, science and democracy and ignore the needs of a growing number of patients suffering from chronic illness, early onset of illness and preventable illnesses.

The proposed action of the MBA would place greater stress on a health system that is poorly placed to deal with the growing numbers suffering from chronic health conditions. You [The MBA] would remove opportunities in preventative health and opportunities to promote optimal health and wellbeing. In short, you would do a huge disservice to the Australian community and public and the future of health care. The MBA's proposal would negatively impact the health of many Australian's and cause such huge stress to the many currently using such essential health care. The MBA must understand that the mental and physical health ramifications from these illogical actions proposed would be significant and negative. The MBA must be

accountable for this. As such, the MBA's proposals seem contradictory to what the public expects the focus of the MBA should be, that is the health and wellbeing of the Australian community. One must ask, therefore, where the MBA'S commitments lie, what and who is driving these proposals and who are the true beneficiaries? Consumers of health services should and must be the primary stakeholders and the consumers must retain the right to choose their health care providers.

MY EXPERIENCE

I discovered the effectiveness and importance of Integrative health practices after many years of attempting to get help through the standard Medical Practice health care system failed to offer any solutions, help or hope. The lack of care, support, options and help offered by standard General Practitioners and Medical specialists coupled with the complete lack of understanding and neglect and putdowns suffered at many appointments resulted in me feeling that continuing on in such a condition was intolerable.

For decades I suffered from misdiagnosis, lack of diagnosis, inappropriate and over prescription of medication - all of which caused more physical harm and deterioration in function and health. General Practitioners and Medical Specialists failed to meet my emotional and physical health care needs in every way. The put downs and the negative impacts experienced with each visit to several different General Practitioners are still traumatic to recall. As a previously healthy, active young person who travelled widely, worked hard as Clinical Nurse Consultant in a busy Public Hospital and who had an active out of work life, it was devastating to be faced with sudden and drastic decline in physical health. In spite of severe physical and cognitive clinical symptoms, recurrent high temperatures and other measurable symptoms and with increasing disability, General Practitioners and a range of expensive Medical Specialists could not give me a diagnosis. I was told by these General Medical Practitioners and Specialists that it was in my head, I just had to put up with it, that nothing could be done, that they would ignore my chronic symptoms, humiliated and belittled. I was incorrectly diagnosed time and time again with depression and had high doses of antidepressants prescribed. Inappropriately prescribed medication [eg antibiotics, steroids, many different antidepressants, etc {and further medication to treat the side effects of these medications}] sent my physical health spiralling down hill and did nothing to improve my condition or ability to participate normally in life. Eventually, after 8 years of this demoralising and harmful treatment, a Respiratory Specialist admitted me to hospital for a week, ordered many tests and scans and eventually gave me a diagnosis of ME/CFS. I was sent home after being told "sorry there is no treatment and there is no benefit in you seeking out support groups or dwelling on it"! In other words, I was told there was nothing the Medical system could offer nor was there anything I could do to help myself. This was incorrect medical advice.

It is fair to say I probably would not be here if it was not for Integrative Medical Practitioners. After years of belittling and harmful comments from General Practitioners, no treatment options and in a situation where I could not return to work and I was struggling to live up to my expectations of being a mum to two young children, I

felt life was intolerable and I had nothing to offer.

A chance meeting led to me find Medical Practitioner who with his additional training, knowledge, and experience and skill in clinical observation, biochemistry and and with extended consultations and history taking and additional tests, was able to identify root causes of symptoms and identify illness. Treatment options and pathways were identified that lead to immediate and continued visible , measurable improvements in my health and wellbeing and lead to me being able to participate in life, contribute to society and be there for my family and children. This Integrative GP was the first doctor to give me hope and options and, ultimately, gave me a life worth living.

THE VALUED AND ESSENTIAL ROLE OF INTEGRATIVE MEDICINE

Integrative Medical Practitioners are able to use their advanced training and experience to order and interpret additional tests and provide treatment options backed by clinical evidence. They made a point of showing me all the research available. As a nurse I was interested in this but as a patient I was more interested in the obvious and recognisable improvements in my health. For years General Practitioners had said “your blood tests were normal, there is nothing wrong with you’. They did not look at the patient in front of them, her history symptoms and were unable to use clinical assessments beyond blood tests and scans to the benefit of their patient. A Medical Practitioner must be able to use their skill, knowledge and clinical judgement to effectively care for their patients. The MBA’s proposals would threaten that ability. That would be a crime against society.

Standard Medical General Practice demonstrated it could not achieve these outcomes and instead caused physical and emotional harm. Standard Medical General Practice also robbed me of a chance to return to optimal health due to the failure to correctly diagnose my condition and the associated ignorance regarding available treatment and interventions.

Integrative Medical Practitioners also improved my health and assisted with recovery following surgery and cancer treatments, with hormonal and thyroid issues and much more. My quality of life is significantly higher due to these essential services and the treatments and natural alternatives offered. Integrative Health is my choice of care in many instances, and I can not believe something that offers so much improvement and help and that is demonstrably safe, is under threat.

In addition to my own experiences, where my health and wellbeing needs were not able to be met by standard GP service, my family have heavily relied on Integrative GP's to meet their health care needs to improve general health, prevent disease and illness and to find solutions to ensure optimal health and functionality. My family has all benefited from the longer consultations and testing required to get to root causes, existing problems, non pharmaceutical approaches, diet and lifestyle changes. Thanks to Integrative GP's, my children should be able to avoid a life time of health issues that I and many others struggle with. Integrative GP'S also empower the patient to be responsible for good health and lifestyle choices, lessening the demand over time on both conventional and integrative GP time.

The standard 10 minute GP consultation will not address the issues or result in improved health for many with chronic medical conditions. Patients deserve and demand more. Good health care demands more.

As a family, we use both conventional and Integrative GPs. Conventional GP'S are aware that we use both and supportive of our choice. Conventional GP's have expressed their lack of resources and knowledge and the time required to effectively diagnose and offer treatment options fo ME/CFS.

RESPONSE TO QUESTION 1.

I do not agree with the proposed term “complementary and unconventional medicine and emerging treatments”. This has all the hallmarks of a political move to create division which will allow discrimination against both Integrative Practitioners and patients using this essential health care.

The definition of integrative medicine proposed by the Australian Integrative Medicine Association (AIMA) is more appropriate :

"Integrative medicine is a philosophy of health care with a focus on individual patient care. It combines the best of conventional Western medicine with evidence-based complementary medicine and therapies. Integrative medicine reaffirms the importance of the relationship between practitioner and patient, focuses on the whole person, is informed by evidence, and makes use of all appropriate therapeutic approaches, health care professionals and disciplines to achieve optimal health and healing. Integrative medicine takes into account the physical, psychological, social and spiritual wellbeing of the person with aim of using the most appropriate, safe and evidence-based treatments available."

RESPONSE TO QUESTION 2:

NO. I do not agree with the proposed definition of complementary and unconventional medicine and emerging treatments – ‘any assessment, diagnostic technique or procedure, diagnosis, practice, medicine, therapy or treatment that is not usually considered to be part of conventional medicine, whether used in addition to, or instead of, conventional medicine.

These issues are too broad and in some cases undefinable and should not be grouped together.

RESPONSE TO QUESTION 3

NO. I do not agree with the nature and extent of the issues identified in relation to medical practitioners who provide ‘complementary and unconventional medicine and emerging treatments’?

Integrative GP'S are highly educated doctors who follow a balanced approach to mental, emotional, physical body systems and lifestyle changes. Treating the whole person helps to get at the root cause unlike simply addressing the symptom. These treatments are statistically safe and well tolerated. Integrative medical practice is generally much safer than first option of pharmaceutical based medical treatment. However Integrative Practitioners have full scope to use pharmaceutical based care as needed.

In addition Integrative GPs have full medical training in both conventional and integrative therapies and are able to refer to appropriate Specialists or commence conventional medical care in the same manner regular GP'S do. Integrative GP's are able to combine the best of conventional and integrative medicine into clinical practice to ensure the best outcomes for their patients, to manage chronic disease, complex illness which in my personal experience, is often poorly managed or managed with negative outcomes by conventional medicine. Extra regulations are not only uncalled for they would do considerable harm.

In regards to evidence based treatments, new research is always changing the boundaries on this. Integrative GP's are often ahead of their peers in terms of being up to date with research and able to integrate the findings into their treatment options. I have greatly been aided by this. The Medical Practitioners have always shown me the relevant scientific data. It has been stated that it takes many years for Medical schools to catch up with the science. As the MBA has not adequately defined emerging treatments, proposed regulations would potentially hinder patient wellbeing and the range of treatment options available. The MBA should be embracing medical innovation and encourage its adoption into all areas of medicine. To act so as to stifle it instead is outrageous. Medical Practitioners should be free to use their expertise, research, clinical judgement and experience to use treatments known to be safe in consultation with their patient.

In regards to informed consent, I have always found that Integrative GP's spend more time giving information and educating patients during their extended consultations. Informed consent is given in more depth with greater patient understanding of benefits, risks and options. Outcomes are monitored closely and followed up with comprehensive clinical assessment. Are not medical practitioner's trained to tests the patient's response to treatment and make clinical judgements and treatment choices based on this.

In regards of financial reward, Integrative Health consultations are by far better value for my money in terms of length of consultation and with greater outcomes for certain issues. This makes me less of a burden on the Medicare system. I choose to spend more to have such care. I believe this essential health care service should be available for all and the MBA should consider Medicare options to allow equality of access. The important message is that patients must have this treatment available to them and be able access it if they so choose.

The MBA , by its own account, has appeared to say they are actually lacking knowledge of and data on the issues they are concerned about and wishing to regulate. The MBA has failed to provide sufficient evidence or data that reflect a need for further regulation. These are safe practices that do not need further regulation.

Perhaps also the MBA should consider why so many people seek Integrative health care and treatments , rather than assuming we are taken advantage of and are indulging in treatments which do not help and that we waste our money. Often conventional medicine fails to deliver results or benefits.

If patients do not feel comfortable in talking to other health care professionals about their use of Integrative Medicine it is due to the judgement and lack of education of those other Health Professionals. The burden to rectify that situation does not lie with Integrative Health or imply Integrative Practitioners should therefore have extra regulations! That is ludicrous. The MBA's proposal of division and regulation would only increase these problems. The MBA should instead consider how to educate other Health Professionals on the value of Integrative Health and its applications and benefits. Discrimination and false judgement should not be accepted and has no room in the health care environment as it is only detrimental to the patient.

RESPONSE TO QUESTION 4

No. I don't have concerns with the practice of 'complementary and unconventional medicine and emerging treatments' by medical practitioners.

RESPONSE TO QUESTION 5

NO. Extra safeguards are NOT needed for patients who seek 'complementary and unconventional medicine and emerging treatments'. The safeguards already in place for all medical practitioners are adequate. Proposed regulations and restrictions would deny Australian patients the choice of health care and will force Australian patients to seek alternative unqualified treatment and in some cases, overseas treatment, at considerable cost and potential risk or to self treat. This puts patients at risk of harm and adds huge financial burden and stress to the patient.

RESPONSE TO QUESTION 6

Is there other evidence and data available that could help inform the Board's proposals? I believe consultation with Integrative Health providers/ bodies and educators should be paramount in regards to this.

RESPONSE TO QUESTION 7

Is the current regulation (i.e. the Board's Good medical practice) of medical practitioners who provide complementary and unconventional medicine and emerging treatments (option one) adequate to address the issues identified and protect patients?

Yes whereas the MBA's proposals will harm the future of health care and the patients seeking integrative health care.

RESPONSE TO QUESTION 8

Would guidelines for medical practitioners, issued by the Medical Board (option two) address the issues identified in this area of medicine?

No. In addition, the MBA has failed to demonstrate any significant issues in terms of patient safety or absolute data in terms of other proposed issues.

RESPONSE TO QUESTION 9

The Board seeks feedback on the draft guidelines (option two) – are there elements of the draft guidelines that should be amended? Is there additional guidance that should be included?

The proposed new guidelines [option2] should be discarded and the existing regulations left unaltered.

Proposal 2 would result in patients seeking alternative health outside the regulated Medical system.

RESPONSE TO QUESTION 10

Are there other options for addressing the concerns that the Board has not identified?

This is poorly worded and hence unclear. Therefore I have no comment.

CONCLUSION

It is incomprehensible to me that Integrative Medicine and its practice, is being threatened by the MBA's proposal of additional regulations and restrictions. The MBA has caused huge stress by these current proposals amongst a patient population that is already often poorly served by conventional medicine. It is a direct threat to our health and wellbeing and against our democratic rights of freedom of choice. I do not believe The MBA has the best interest of the Australian public as their focus with this proposal. The MBA's approach would diminish the ability of fully trained medical practitioners to perform optimally and to secure best outcomes for their patients. The MBA should re-assess its role, its priorities, who are main stakeholders are and how to best manage a growing health crisis and how to stay current and support the practitioners and the development of medicinal practices to achieve better health outcomes. The MBA should ensure it maintains the patient right and freedom to choice of health care.

NB Please maintain confidentiality and do not publish my name.