

Submission

Draft revised guidelines: Telehealth consultations with patients

Thank you for inviting the Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) to make a submission to the Medical Board of Australia (MBA) on the Draft revised guidelines: Telehealth consultations with patients (draft Guidelines).

RANZCOG is the lead standards body in women's health in Australia and New Zealand, with responsibility for postgraduate education, accreditation, recertification and the continuing professional development of practitioners in women's health, including both specialist obstetricians and gynaecologists, and GP obstetricians.

Specific Feedback

RANZCOG is of the view that the draft Guidelines are clear, pertinent and succinct. RANZCOG would like to propose the following amendments for consideration of the MBA.

- *'telehealth...should not be considered as a substitute for face-to-face consultations.'*ⁱ
Given that telehealth is a substitute for face-to-face consultations, RANZCOG proposes the following variation of terminology to further clarify this statement:

'Telehealth should not be considered as an equal or complete substitute for face-to-face consultations'.

- *'telehealth is generally most appropriate in the context of a continuing clinical relationship with a patient that also involves face-to-face consultations. A mix of face-to-face and telehealth consultations can provide good medical care.'*ⁱⁱ

In RANZCOG's view, a 'continuing clinical relationship' is a complex concept. The wording insinuates that telehealth can only be a part of an ongoing clinical relationship between an 'individual clinician' and an 'individual patient'. Generally, many people these days present with comorbidities that are being managed by multiple clinical teams. Therefore, it is impractical, particularly for rural residents, to establish a 'continuing clinical relationship' with individuals within clinical teams, and to be expected to attend appointments in person with teams based far away. Thus, it is emphasised that telehealth is beneficial in these situations where local GPs and specialist teams are available for in-person patient consultations, working closely with specialist teams in large metropolitan centres to support expert clinical care. Moreover, telehealth is also advantageous for metropolitan based people who have mobility, transport or care commitment constraints which make attending multiple 'in person' appointments difficult. To this end, RANZCOG is of the view that telehealth is becoming an integrated part of a sensible and efficient health care model in Australia.

Considering the above, RANZCOG recommends clarification that a 'continuing clinical relationship' reflects a relationship with a 'clinical team' rather than an 'individual clinician', and that that team may involve local clinicians who provide the face-to-face contacts when needed, and distant teams who should, whenever appropriate, interact via telehealth.

- *'Have a consultation space that is quiet and free from distractions and does not allow others to hear any audio or view the consultation on screen.'*ⁱⁱⁱ

It is noted that consultations may involve support persons who may be present in person with the patient or may be tuned in via video camera link virtually, with the patient's consent, and at the invitation of either the patient or the clinician leading the consultation. Thus, only people who are invited and have the permission of the patient to be present can hear what is being said, and can see the clinical interaction. To this end, it is recommended that the statement to be modified to reflect that the patient and those participating in the confidential meeting must ensure that no one else is present beyond the view of the cameras/ audio visual equipment that are being used to facilitate the meeting.

- *'Confirm to the best of your ability the identity of the patient and any other persons present at each consultation.'*

For record keeping purposes, RANZCOG recommends addition of the word 'document' to the statement as follows:

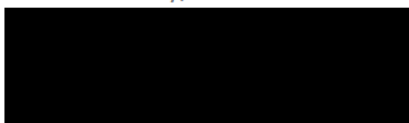
'Confirm and document to the best of your ability the identity of the patient and any other persons present at each consultation.'

- *'In addition to the information that would be documented in a face-to-face consultation, keep a record of consent from all participants if the consultation is recorded and/or when information is uploaded to digital health infrastructure.'*^{iv}

RANZCOG recommends further clarification and definition of the phrase 'digital health infrastructure'.

RANZCOG acknowledges with thanks, the contribution of Dr Diane Mohen on behalf of the RANZCOG Australian Workforce Working Group and also Dr Judith Gardiner on behalf of the RANZCOG Regional Fellows Committee, for this submission.

Yours sincerely,



Dr Benjamin Bopp
President

References

ⁱ Medical Board of Australia (MBA). Draft revised guidelines: Telehealth consultations with patients. Background, p.8. 2022. Available at: <file:///C:/Users/mjayawickrama/Downloads/Medical-Board---Public-Consultation-%E2%80%93-Telehealth-consultations-guidelines.PDF>

ⁱⁱ Ibid.

ⁱⁱⁱ Ibid, p.9.

^{iv} Ibid, p.10.