

From: [REDACTED]
To: [medboardconsultation](#)
Subject: Revised telehealth guidelines consumer impact
Date: Wednesday, 1 February 2023 4:31:15 PM
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Hi there,

I am the digital health policy officer at CHF and my remit includes telehealth. I have been looking at the revised telehealth guidelines consultation paper.

I notice the statement saying that there is not expected to be a negative impact on vulnerable consumers by the removal of text-based renewal of scripts, and was wondering if you could justify that statement. Having seen some indication on consumer surveys that a number of vulnerable people feel differently, particularly in the face of extreme GP wait times and the difficulty of accessing services to acquire repeats.

If you could please outline to me what led to that statement I would be grateful.

Thanks,

[REDACTED] (He/Him)
Digital Health Policy Officer

E: [REDACTED]
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CHF acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to elders both past and present.
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Consumers Health
Forum OF Australia

SUBMISSION

AHPRA – Guidelines: Telehealth consultations with patients

February 2023

Consumers Health Forum of Australia (2023)
*AHPRA – Guidelines: Telehealth Consultations
with Patients* . Canberra, Australia

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Introduction

Consumers Health Forum (CHF) is the national peak body representing the interests of Australian healthcare consumers and those with an interest in healthcare consumer affairs. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems. At the heart of CHF's policy agenda is consumer-centred care. CHF appreciates the opportunity to provide a submission to the AHPRA Medical Board on their Draft revised guidelines: Telehealth Consultations with patients.

Issues

Consultation with consumers

In appendix B, one entry in the list of consumer organisations consulted is "Health Consumers of Rural and Remote Australia Inc Consumers Health Forum". As HCRRA is listed further down and is not associated with CHF, we believe this is written in error and must be amended. In addition, we are not aware that we have provided any feedback on this issue, and thus believe it is inappropriate to claim to have consulted CHF. There are numerous other consumer peak bodies that share the same concern. HCQ and HCC WA have both expressed to CHF that they are not aware of their having participated in consultation with AHPRA on this matter, despite their inclusion on the list within the draft.

Impact on vulnerable people

On the issue of the retraction of support for asynchronous text-based prescriptions, the draft states that there is not projected to be any impact on vulnerable people and doesn't provide any support for that statement. Some consumer studies have shown that this is not necessarily a view shared by consumers, and particularly by vulnerable consumers. In order to make a statement of this magnitude, on an issue that can strongly impact access to prescription medication, especially in times of a GP crisis, it must be supported by substantial evidence. CHF would welcome evidence of consumer consultation on this.