



Dr Anne Tonkin  
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Dear Dr Tonkin

**HCCA submission to Medical Board Consultation on the  
Draft revised guidelines: Telehealth consultation with patients**

Thank you for the opportunity to provide consumer input into the Medical Board Consultation on the revised *Guidelines: Telehealth consultations with patients* (the guidelines). We have spoken with members and networks to review the guidelines and our submission is based on their feedback.

HCCA broadly supports the revised guidelines and consider them to support safe, accessible and positive consumer experiences of and outcomes from telehealth.

COVID-19 has proven to be a great disruptor and given momentum to digital health reform. The increased use of telehealth consultations has provided consumers with opportunities to use technology to improve access to health care.

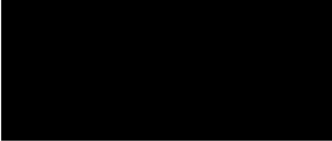
There is a place for online medical services as part of the overall provision of healthcare services in Australia. Expanded access options are especially important in the current environment, where consumers are facing significant out of pocket costs to access primary care and often face long delays to see their GP of choice. Online health services such as MedMate, Doctors on Demand, Instant Consult, Telehealth Doctor and InstaScripts support vital access for consumers, but they, and any other health services providing exclusively telehealth consultations must operate in a way that upholds patient safety, privacy and confidentiality and quality use of medicines.

**Health Care Consumers' Association**

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We hope HCCA's feedback is useful information for your consultation process. We would be very happy to clarify any of the points raised in our submission. Please contact [REDACTED], Manager of Policy and Research, via email – [REDACTED] or phoning the HCCA office.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Darlene Cox  
Executive Director

20 February 2023



**SUBMISSION**

**Medical Board Consultation  
Revised Telehealth Guidelines**

20 February 2023

## General Comments

### **Communication, safety and partnering with consumers in healthcare**

Effective communication is a key element of high quality and safe patient care. This is reflected in the Good Medical Practice – Code of Conduct<sup>1</sup>, the Australian Charter of Healthcare Rights (2<sup>nd</sup> edition)<sup>2</sup>, and the National Safety and Quality Health Service Standards (Partnering with Consumers<sup>3</sup> and Communicating for Safety<sup>4</sup>).

These standards set out clearly what consumers and communities can expect of health care professionals. This includes ethical, culturally safe and professional conduct.

We need doctors to maintain systems and processes that support effective communication to ensure safety and promote good health outcomes. We strongly support the requirement for the standards that apply to face to face consultations – as set out in these standards and the Code of Conduct - also apply to telehealth services.

### **Telehealth facilitating access to care**

In the COVID-19 pandemic environment, telehealth has become more broadly used across our healthcare system, supported by wider availability of necessary technology in both the community and health services. This accelerated advance in the use of technology includes e-prescribing and as well as telehealth consultations.

The guidelines need to support safe, accessible and positive consumer experiences of and outcomes from telehealth. The guidelines promote practice that delivers benefits beyond the COVID-19 pandemic. Telehealth can enable easier access to health care services for a wide range of consumers<sup>5</sup>. There has been a clear move to embrace virtual care on the part of both consumers and services. Benefits consumers associate with virtual care experiences include convenience, saving time and feeling at ease in their own home/surroundings<sup>6</sup>. The availability of telehealth services can also help facilitate a more flexible and sustainable health workforce. Telehealth can also help pave the way for future digital health innovations to both encourage and simplify communication between clinicians and consumers, HCCA views this as a key benefit.

### **Summary**

We support Option 3 presented by the Board to work towards merging and revising existing guidelines to bring these up to date for health professionals and the community. We appreciate the intention is to minimise confusion and to update the guidelines to reflect current needs and also merge the documents.

However, we believe that online services, such as those which help provide access to prescriptions or prescription renewal, have a place in the provision of healthcare services in Australia. These services must operate in a way that upholds safety, quality use of medicines, and support vital access for consumers, particularly at a time of national shortages in the GP workforce.

## Broader context of health care reform

The Strengthening Medicare Task Force Final Report refers to the introduction of voluntary patient registration. This will be a significant change to how health care is accessed and has the potential to support improved continuity of care, consumer-centred care and strengthen relationships between the patient and their care team.

## Specific Comments

### Challenges in accessing care and the importance of telehealth

There are significant challenges for consumers in accessing health care, especially primary care. As one consumer shared with us:

*In an ideal world, I would love for all my GP appointments to be with my preferred GP as I feel it is important to the quality of my care to develop and maintain a relationship. However, it often will take three or more weeks to schedule an appointment with my preferred GP, which is fine for planned appointments, but doesn't work for my more urgent and unanticipated needs.*

Challenges for consumers in accessing medical services are varied and can be overcome by telehealth consultation. This includes:

- Significant wait times for an appointment, for example, especially to see your preferred GP which means consumers are looking for more timely options for care.
- Out-of-pocket costs for appointments have been increasing as the Medicare rebates have not kept pace with the cost of delivering health care. This means cost can be prohibitive and consumers defer appointments.
- There are waiting times when attending an appointment in person, meaning a 15-30min appointment, along with travel and wait time, can end up taking much longer.
- Consumers often need access to care outside business hours. The afterhours options for primary care are limited. While there are deputising services, these are often booked out and are not available when people need the care.
- The out-of-pocket costs for appointments, which have been increasing and can be prohibitive
- Consumers can find it hard to manage caring responsibilities while accessing face to face consultations
- Consumers are concerned about the risk of COVID-19 infection when attending face to face consultations.

We support the principle of consumer empowerment. For consumers with high level understanding of their health, they are well placed to make decisions about where they access health care. Some consumers will effectively manage their use of multiple providers, including online health care providers.

### **Continuing Clinical Relationships (p9, consultation document)**

We know that continuity of care is strongly associated with better health outcomes. While we appreciate the Board's view that telehealth is generally most appropriate in the context of a continuing clinical relationship with a patient that also involves face-to-face consultations, based on recent consumer experience we do not see this as achievable. Depending on a range of factors, including health literacy and other personal priorities, not all consumers consider continuity of care in the same way. Current funding models in primary health care, for example, don't necessarily lead consumers to understanding the value of continuity of care. Also, the changing face of general practice means that the model of care is different. Consumers may have a regular practice but may often see a number of doctors due to availability.

HCCA suggests that while telehealth does play an important role in the context of rural and regional healthcare, it can be a valuable tool for accessing healthcare no matter where a consumer resides. This has been well demonstrated during the pandemic.

There is a place for telehealth in providing episodic care with a health professional with whom we may not have a continuing therapeutic relationship. This includes for script renewal. Online health care providers are filling a service gap that general practice is struggling to address.

### **Prescribing via telehealth (p10-11 of consultation document)**

We understand from the consultation document that the Medical Board does not support one-off prescribing, where the practitioner has not previously consulted with the patient, especially where communication occurs via text, email or online. We note that there have been a number of online prescribing services emerging and operating in Australia in recent years.

In contrast to the Medical Board, HCCA believes there is a place for these services in meeting consumer needs. A consumer told us:

*I know plenty of people who have used these kinds of services as part of their personal health toolkit (for want of a better term) who would not avoid seeing a doctor in general, but they are just making considered decisions about what best meets their needs, depending on their circumstances at the time. Sometimes you need a script renewal urgently and there are limited options available, or you simply can't afford the out-of-pocket costs for a doctor's appointment as well as the cost of filling your prescription, for example.*

These services provide an accessible option for people who find it difficult to make appointments within business hours, as well as those in regional, rural and remote areas where there is limited access to care. These services also have the capacity to

support consumers with special needs, such as certain mental health conditions, people who are deaf and people with other disabilities.

### **Quality Use of Medicines (QUM)**

Ultimately, it is important for the Medical Board's revised guidelines for telehealth consultations, particularly in the area of prescribing, to support the aims of Australia's National Medicines Policy<sup>7</sup>, in particular to help ensure:

- Equitable, timely, safe and affordable access to a high-quality and reliable supply of medicines and medicines-related services for all Australians.
- Medicines are used safely, optimally and judiciously, with a focus on informed choice and well-coordinated person-centred care.

We believe that there is a role for online prescribing services in Australia. These services do not replace other medical services, face-to-face appointments, or the need for continuity of care over time, but they do provide necessary and timely access for consumers when needed.

In addition – we note that as the overall number of repeat prescriptions tend to be limited, we suggest that doctors might make clear to their patients to make appointments in advance for prescription reviews and renewals, if it is the doctors' intention to ensure timely review of the prescription as part of a longer-term plan for care.

## About HCCA

The **Health Care Consumers' Association (HCCA)** is a health promotion agency and the peak consumer advocacy organisation in the Canberra region. HCCA provides a voice for consumers on local health issues and provides opportunities for health care consumers to participate in all levels of health service planning, policy development and decision making.

HCCA involves consumers through:

- consumer representation and consumer and community consultations;
- training in health rights and navigating the health system;
- community forums and information sessions about health services; and
- research into consumer experience of human services.

HCCA is a Health Promotion Charity registered with the Australian Charities and Not-for-profits Commission.

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<sup>1</sup> Good Medical Practice – Code of Conduct <https://www.medicalboard.gov.au/Codes-Guidelines-Policies/Code-of-conduct.aspx>

<sup>2</sup> Australian Charter of Healthcare Rights (second edition) - A4 Accessible | Australian Commission on Safety and Quality in Health Care. <https://www.safetyandquality.gov.au/publications-and-resources/resource-library/australian-charter-healthcare-rights-second-edition-a4-accessible>

<sup>3</sup> Partnering with Consumers Standard | Australian Commission on Safety and Quality in Health Care. <https://www.safetyandquality.gov.au/standards/nsqhs-standards/partnering-consumers-standard>

<sup>4</sup> Communicating for Safety Standard | Australian Commission on Safety and Quality in Health Care. <https://www.safetyandquality.gov.au/standards/nsqhs-standards/communicating-safety-standard>

<sup>5</sup> Deeble Institute Perspectives Brief No. 10, *Providing telehealth in general practice during COVID-19 and beyond* (2020) [https://ahha.asn.au/sites/default/files/docs/policy-issue/perspectives\\_brief\\_no\\_10\\_providing\\_telehealth\\_in\\_general\\_practice\\_0.pdf](https://ahha.asn.au/sites/default/files/docs/policy-issue/perspectives_brief_no_10_providing_telehealth_in_general_practice_0.pdf)

<sup>6</sup> NSW Bureau of Health Information, *Patient Survey Results: Virtual Care Survey 2020* (2021) [https://www.bhi.nsw.gov.au/BHI\\_reports/patient\\_survey\\_results/virtual\\_care\\_survey\\_2020](https://www.bhi.nsw.gov.au/BHI_reports/patient_survey_results/virtual_care_survey_2020)

<sup>7</sup> National Medicines Policy (2022) <https://www.health.gov.au/resources/publications/national-medicines-policy?language=en>