



Dr Anne Tonkin
Chair Medical Board of Australia
Level 7, 111 Bourke Street
Melbourne
VIC 3000

Via email: medboardconsultation@ahpra.gov.au

Dear Dr Tonkin

Re: Draft revised guidelines: Telehealth consultations with patients

The Australian College of Nursing (ACN) would like to thank the Medical Board of Australia (the Board) for the invitation to provide additional feedback on the draft revised Guidelines: Telehealth consultations with patients (the guidelines).

As a national leader of the nursing profession, ACN supports all measures that will improve the health and wellbeing of all members of the Australian community. ACN supports the Board's preferred option of revising the current existing guidelines in principle. Scaffolding and adapting these existing guidelines to suit the future and emerging needs of telehealth are the most adequate option to ensure healthcare consumers are receiving adequate care and access in a timely manner.

The Draft Guidelines make it clear that telehealth **should not** be a 'substitute' for in-person care, and the practitioner should 'continually' assess the appropriateness of telehealth and have 'arrangements' in place for in person consultation 'where necessary'. The introduction to the Draft Guidelines confirms that telehealth is generally most appropriate in the context of an ongoing clinical relationship that also involves face-to-face consultations.

ACN members provide the following comments in response to the consultation questions.

1. Is the content and structure of the draft revised Guidelines: Telehealth consultations with patients helpful, clear, relevant, and workable?

ACN members believe that overall, the revised guideline is clear, relevant, and workable.

2. Is there anything missing that needs to be added to the draft revised guidelines?

The importance of documentation and the imperative that the patient's usual GP is informed of any treatment or tests ordered during the consultation.

3. Do you have any other comments on the draft revised guidelines?

ACN advocates for patient-centred care and access to adequate healthcare for all. Telehealth is a vital service in our healthcare system and should be viewed as an opportunity to strengthen the healthcare system. Therefore, ACN would like to highlight the opportunity for the Board to



reconsider amending the wording on the proposal of discourage healthcare practitioners from prescribing or providing healthcare for a patient with whom a doctor has never consulted. ACN acknowledges that an in-person appointment is ideal in most scenarios, however, the wording of the statement may have unintended consequences.. It is common for patients to have a regular practice, as opposed to a regular GP. Also, where does the afterhours locum service for the practice stand in these cases?

If you have any questions, please do not hesitate to contact the Director of Policy and Advocacy at
[REDACTED].

Yours sincerely,

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Dr. Carolyn Stapleton FACN
Director of Policy and Advocacy