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The Medical Board of Australia

By email: medboardconsultation@ahpra.gov.au

Dear Sir/Madam,

Consultation: Revised Telehealth Guidelines

Thank you for your consultation paper dated 14 December 2022 regarding the Medical Board of Australia's draft revised guidelines on telehealth consultations with patients. With our extensive and long-standing experience in telehealth services, Healthdirect would like to take the opportunity to offer input on the proposed guidelines.

Healthdirect Australia is a not-for-profit, trusted, national virtual public health information service delivering a wide range of virtual health services across Australia on behalf of governments. The healthdirect helpline, known as NURSE-ON-CALL in Victoria, is available 24 hours a day, 7 days a week in all Australian states and territories except Queensland. In the after-hours period, callers to healthdirect may be offered a telephone or video call back from a doctor via the after-hours GP helpline, an extension of the healthdirect helpline.

Healthdirect also established Healthdirect video call, which was established in 2016 as a conferencing service purpose-built for clinical consultations. The service is at the forefront of telehealth technology and integrates seamlessly into Australia's modern health system with over 2 million consults on the platform since January 2020.

Telehealth has been transformational to Australia's universal health care and has played a critical role in ensuring the continuity of care for hundreds of thousands of Australians during the COVID-19 pandemic, protecting the health of patients and health professionals. It offers greater access and flexibility to health care and is now a permanent feature of Australia's universal Medicare system. The Healthdirect video call platform currently supports approximately 34% of the nation's General Practitioners under the federal government Department of Health and Aged Care funding arrangement.

In August 2022, the Healthdirect after-hours GP helpline, which is available to rural and remote areas, was expanded in New South Wales to address the surge in demand during the winter season that resulted in access difficulties in the healthcare system, including ambulance services, general practices and Emergency Departments (ED) in New South Wales. The expanded GP service provides eligible callers in New South Wales with access to a telehealth consultation with a general practitioner, including e-prescribing capabilities. This service is only activated when the caller is unable to access general practice services within the clinically recommended timeframe, following a nurse triage on the phone. During the acute telehealth consultation, the GP may prescribe medication if deemed clinically appropriate. An evaluation of the impact of the expanded GP helpline on patient care in NSW conducted in November 2022 was positive, with access to emergency prescriptions highlighted as averting ED visits. This service is still currently running, and fully supported by NSW Health.

Healthdirect Australia is working to increase the inter-connection of our information, advice and virtual services with other services in the health and aged care systems. This includes triaging callers presenting with acute health conditions to virtual GP services where they have no access to a GP and

avoiding emergency department admissions where clinically appropriate. It is proposed that the draft revised guidelines take into account these instances of acute care which serve as a safety net for individuals unable to access a medical consultation and a prescription within the clinically recommended timeframe for their condition, alleviating unnecessary pressure on the emergency services. This would aid improved overall effectiveness of the healthcare system, as indicated through [Australia's Health Performance Framework](#) in which selected potentially preventable hospitalisations is an indicator of overall healthcare system effectiveness.

Healthdirect is pleased to have the opportunity to provide the following comments on the draft guidelines:

1. Definitions of telehealth and online prescribing

The definition of telehealth needs to differentiate between 'treatment' and 'curative aspects' of care. It is recommended that triage services, health information and advice be included as domains for the usage of telehealth.

The term "online prescribing" requires further defining and to distinguish provision of a prescription to a patient being consulted via telehealth from a prescription being electronically produced and/or sent.

2. Clarifying guidance on virtual care and virtual prescribing

The section on prescribing considers the features of quality care when provided virtually, i.e. not face to face. We welcome the concept that higher risk activities like prescribing medicines need to be designed appropriately when a patient is receiving virtual care. Our interpretation of the guideline is that consultations can be conducted via video, phone or face-to-face, and that prescribing may be appropriate in these consultations. We are concerned that the guidelines could be misinterpreted such that some practitioners may think prescribing cannot occur via phone or video, or during a first consultation, and would welcome an explicit statement in the guidelines to define the term 'consultations' to include real time interactions between a practitioner and patient, including telehealth (voice or video).

3. Role of telehealth in improving access to healthcare

In paragraph 4, under the section on what to do before a telehealth consultation, the important role of telehealth, in ensuring access to care where face-to-face consultations may be impractical, is highlighted. Reduction in access to face-to-face consultations may also be amplified by seasonal surges in demand, unforeseen geographical isolation and workforce shortages. These are additional examples of where access to telehealth services for acute care can make a tangible difference to reducing the burden on the healthcare system.

Thank you again for the opportunity to consider your draft guidelines.

Yours sincerely,



Dr. Nirvana Luckraj
Chief Medical Officer
Healthdirect Australia