

MEDMATE AUSTRALIA SUBMISSION TO AHPRA PUBLIC CONSULTATION PROCESS REVISED TECHNOLOGY BASED CONSULTATION GUIDELINES FEBRUARY 2023

### <u>Summary</u>

- 1. The revised guidelines for technology-based consultations will do more public harm than public protection.
- 2. Consumer perspectives, particularly from vulnerable groups, are strongly opposed to these restrictions. Patient groups have not been appropriately consulted.
- 3. We recommend that the sections regarding prescribing are removed to allow time for an independent assessment of Australia's digital health framework including digital consultations.
- 4. We recommend a Parliamentary Inquiry into the future of digital health in Australia.

### Introduction

Australian's have access to one of the best medical systems in the world. Our primary care system, based on the fundamental principal of universal healthcare, is doing its best to keep Australian's healthy in the community and meet the needs of patients across the country.

However, we are facing unprecedented challenges - an aging population, the aftermath of a global pandemic and chronic primary care workforce shortages. These challenges are growing, pervasive and are disproportionately impacting vulnerable groups, particularly rural and remote communities.

New challenges need new thinking. We can't keep doing things the same way and expect different results. We must evaluate all care solutions that are emerging that will improve patient outcomes, reduce health care costs, and alleviate pressure on traditional healthcare services including general practice, emergency care and hospitals. Above all, we need to put patients at the front and centre of our thinking.

As a national virtual care platform, Medmate appreciates the opportunity to provide public feedback to the Medical Board of Australia about its revised draft guidelines for Telehealth consultations with patients.

Medmate is a national virtual care platform developed in consultation with GPs, pharmacists and consumers. Medmate is a conformant software product for ePrescribing, and is approved and registered with the Australian Digital Health Agency. The service is staffed by AHPRA registered practitioners who are predominately GPs and emergency department doctors. Patients access immediate online care, receive an assessment with a qualified doctor and get medication delivered to their home, usually within the hour. The virtual care service operates 7 days a week (including afterhours periods and public holidays) and has assisted over 100,000 Australians in 3000+ postcodes. Medmate supports local GP services, providing patients access to initial care when they are unable to access their regular GP. The service uses a combination of asynchronous and real-time communication technologies.

### **Issues with the revised Telehealth Guidelines**

The Medical Board of Australia (the Board) published Guidelines for technology-based consultations and an Information sheet: Inter-jurisdictional technology-based patient consultations in 2012 and 2013.

We have reviewed the Board's draft revised guidelines that have merged and updated the previously published guidance documents and also proposed new guidance on prescribing for a patient with whom a doctor has never consulted:

### *If you have not consulted with the patient*

Prescribing or providing healthcare for a patient with whom you have never consulted, whether face to face, via video or telephone is not good practice and is not supported by the board.

This includes requests for medication communicated by text, email or online that do not take place in realtime and are based on the patient completing a health questionnaire but where the practitioner has never spoken with the patient.

Any practitioner who prescribes for patients in these circumstances must be able to explain how the prescribing and management of the patient was appropriate and necessary in the circumstances.

### The draft additional section restricts healthcare or prescribing for new patients unless undertaken by voice or video. This restricts all other current and future forms of communication technology between a doctor and a patient.

Our summary of the key issues with this proposed section on prescribing are:

Issue	Implications & Risks
Restriction on asynchronous, patient centric, data driven healthcare.	No evidence has been provided to support a restriction on asynchronous healthcare. A restriction will disempower patients, strip consumers of choice, block equitable access to care and stifle urgent health care innovation.
Restriction on health information communication technologies not involving voice or video.	A restriction is being placed on modes of communication technology. This blocks the development of patient centric communication technology such as SMS, chat and virtual reality. Doctors must be trusted to utilise their professional judgement about the appropriate modes and tools of interaction they need to undertake a clinical assessment.
Restriction on care coordinated by a practitioner as part of a multidisciplinary team.	Forces care to be provided individually by the doctor, obstructing key primary healthcare reforms towards utilisation of multidisciplinary care teams in advanced primary care models.

Distrust of Medical Practitioners.	It is further unclear to what point a patient's plea for help becomes inappropriate and unnecessary for medical care. This restriction carries an inherent distrust in medical professionals.
Consumer perspectives are strongly opposed to a restriction on online prescriptions.	Unfairly discriminates and impacts vulnerable groups, removing vital access to healthcare for thousands of Australians. "The proposed restrictions are a retrograde measure denying the real world reality that face patients struggling everyday with a medical system that has few available Doctors (and long waiting times) to book appointments for common prescriptions - Telehealth User".

COAG's policy direction '2019-1' provides "clarity" to AHPRA and National Boards over section 3(3)(c) of the National Law which provides guidance over the application of the National Registration and Accreditation Scheme. This policy calls for AHPRA and the National Boards to "prevent harm".

Further, when determining whether regulatory action should be taken, National Boards and AHPRA "must" acknowledge the potential impact on the public, "including vulnerable people…such as"

- Children
- The aged
- Those living with a disability
- Potential targets of family and domestic violence
- People managing a mental health condition
- People identifying as Aboriginal or Torres Strait Islander
- Rural and remote communities

The draft regulations do not evidence that the above vulnerable populations have been appropriately consulted about the impacts on access to care. Medmate has directly consulted patients about these impacts and the unanimous voice of consumers is that the revised guidelines in their current form are a restriction on choice and will do more public harm than public protection.

We now respectfully detail the key impacts of the proposed changes, outline the results of a large consumer survey with direct patient feedback and provide recommendations to the board.

### The impact of a restriction on communication technologies are profound and immeasurable

The implications of short-term thinking to restrict modes of healthcare communication technology are profound - stifling healthcare innovation in Australia for the next 10 years, a period that will see inevitable changes in healthcare service delivery requirements leveraged by emerging technologies. It is vital that all forms of communication are available to be used safely and sensibly based on the doctor's professional judgement.

The proposed changes result in the restriction on doctor-patient communication that is :

- Not delivered by voice or video
- Not delivered in real-time

Australia is a country of almost 8 million square kilometres. Many rural and remote regions have unreliable mobile phone coverage. Large areas are frequently impacted by natural disasters such as floods and bushfire. It is often very difficult for doctors and patients to have a clear and stable voice or video link to undertake a telehealth consultation in real-time. It is not safe or sensible to restrict modes of communication between doctors and patients. A doctor must have the ability to utilise their independent professional judgement about how to safely undertake a clinical assessment. Restricting modes of care discriminates against all patients, and disproportionately disadvantages rural and vulnerable groups. It reduces access to after hours care and increases avoidable emergency department presentations.

The sensible approach is to have communication options that provide reliable transfer of healthcare information based on the patient need. Text-based communication can occur in real-time or asynchronously. For example, an interaction may commence as an online questionnaire and following an initial doctor review, be supplemented with back-and-forth text or chat between a doctor and patient. It is clear that many , if not the majority of, patients are comfortable and familiar with this form of communication. It is clear, unambiguous, time stamped and auditable. It guarantees a clear digital record of the interaction. The patient is empowered to make their needs clear. This sensible and safe communication is patient centric and it works remarkably well.

Meta-analysis of randomized controlled trials shows that mobile phone text messaging 'increased adherence to taking medications... the ease of use, instantaneous relay of information and boundless reach'<sup>3</sup> making the modality a vital tool for public health. 'The rapid expansion of mobile health programs through text messaging provides an opportunity to improve health knowledge, behaviours, and clinical outcomes, particularly among hard-to-reach populations...text messaging and messaging apps play a key role in strengthening healthcare systems. Besides enhancing the accessibility of health care services, text messaging and messaging apps can open up access to health care services for patients<sup>4,5'</sup>. Zhou et al (University of Queensland) reported that text-based telehealth interventions including email, text messaging, webpage and online chat room, are viable ways to enhance or deliver multiple levels of treatment for eating disorders. They help reduce eating disorder related symptoms, comorbid depression and anxiety , improve body satisfaction and contact between clients and therapists<sup>2</sup>".

A scaled example is Stoke on Trent Clinical Commissioning Group's telehealth system, Florence, used by NHS Hospitals, general practice, mental health and community teams. Florence interacts with SMS text messaging directly to patients, with patient reported readings or symptoms available to clinicians. Florence's technology is linked to a wide range of illnesses and living services, including asthma, diabetes, hypertension, smoking cessation and weight management. Patient responses are linked to the clinician's system so they can review, monitor, intervene or escalate as required.

Restricting text-based telehealth closes the door on the use of patient centric communication technologies. It is not possible for anyone, including the Medical Board, to foresee how future forms of communication (beyond voice and video) may transform interactions between doctors and patients and enhance health care outcomes. The last iteration of these guidelines occurred in 2012. Imagine if the guidelines had defined video or phone consultations "as not good medical practice" in 2012. The blocking of urgent telehealth innovation during the pandemic would have caused a lethal national health crisis. This would seem like an absurd decision now retrospectively. We would imagine that ongoing development in communication technologies is inevitable to meet the healthcare challenges we face. It is still not possible for anyone to predict what forms of technology will be vital for healthcare delivery over the next 10 years. Emerging technologies such as such as chat, biometric wearables and virtual reality are developing to transform and augment service delivery capability.

The challenge we are experiencing is that there is an urgent public need for access to available, equitable and affordable primary care. The scale of the challenge is immense. Australians do not deserve a restriction on healthcare with no evidence. They deserve access to person-centred and initiated primary care.

### **RECOMMENDATION:**

Do not restrict mode of communication technology (real-time or asynchronous) between doctors and patients. Support access to models of care that increase access in after hours periods and prevent avoidable emergency department presentations.

### <u>Virtual first asynchronous telehealth - improving access, empowering patients,</u> <u>reducing costs</u>

There is no evidence that asynchronous or text-based consultations are not good medical practice. Asynchronous telehealth augments traditional primary care models, increasing access to equitable and affordable primary care.

With unprecedented levels of demand and critical healthcare workforce shortages, Australia needs to embrace the next level of virtual care, not restrict it. The health system needs to pivot to an omni-channel service capability that includes synchronous and asynchronous virtual care to meet patient needs, support and improve health care practitioner utilisation, and enable virtual first care models.

Asynchronous telehealth refers to a service mode where there may be a non-real time interaction between a patient and practitioner. Most commonly, this is a means of text based online clinical data collection where the patient completes structured clinical questions, which are then reviewed, assessed, and utilised by the treating practitioner to provide care. Developing capabilities utilise technologies such as SMS, text, chat and AI. Asynchronous care models allow more convenient and efficient virtual health interactions by three main means.

First, asynchronous telehealth empowers consumers with patient centric self-service. They can initiate a care interaction when it is needed, remotely, from their own device. This significantly increases access to care particularly for communities that have limited access to timely face to face primary care services. For patients that have the common experience of their local GP being booked out for weeks, it breaks down this barrier, allowing them to take control of their own health by initiating care whenever and wherever it is needed. Asynchronous interactions are more culturally sensitive and accessible for vulnerable groups such as patients with disabilities, from non-english speaking backgrounds, victims of domestic violence or the LBTQI+ community. Due to the efficiency of the interaction, prices are much more affordable than a video visit or face to face visit - approximately 50% of the average out of pocket gap with traditional GP services with no cost to Medicare.

Second is the impact on provider efficiency and utilisation. Since no scheduling is involved, providers can complete online requests when it fits into their scheduling, such as in between face-to-face visits or after hours. A doctor can review an online clinical request efficiently and decide on the next steps in the clinical assessment. They triage the request based on the clinical information received. Often the structured clinical data received in the online clinical request is as rich or richer than a typical short face to face consultation. This is because the patient has had the time to review the structured clinical questions in the comfort and safety of their own home, refer to their medication list or previous medical records when providing answers or seek the help of a carer or family member. It takes the pressure off patients that have only previously had the option of a 10 minute time pressured face to face consultation. The result is that for stable medical conditions, such as a prescription renewal of regular medication, the structured data may be sufficient to provide initial care or lead to an efficient text-based interaction with the patient to clarify dosages,

indications, and side effects to safely prescribe a limited amount of medication. This care interaction enables accessible care in between regular GP face to face appointments and stops patients from presenting unnecessarily to emergency departments for non-urgent issues.

Thirdly, asynchronous healthcare augments other forms of doctor-patient communication to enhance practitioner efficiency. Often online requests for assistance may lead to the doctor undertaking an extended text, phone or video consultation with the patient. Doctors utilise the structured clinical data to efficiently make a clinical decision about the best modality for further communication. Digital consults may start as an online questionnaire leading to a doctor making a decision to send a video link to complete the assessment. For example, to examine a sick child or a rash. Other medical conditions can be safely completed with a telephone call. Doctors utilise their professional judgement about the modality of communication. The result is that asynchronous telehealth coupled with real-time SMS, phone or video consultation, dramatically increases efficiency for practitioners, meaning more people can receive care per doctor consultation hour - and it's just as effective. A systematic review evaluating the efficacy of asynchronous telehealth as compared to conventional clinical visits undertaken by Nguyen et al concluded that asynchronous care 'may provide clinical outcomes that are comparable to those provided by in-person care and reduce health care costs'<sup>1</sup>

Lastly, the draft guidelines call for "any practitioner who prescribes for patients in these circumstances (where there has been no initial face-to-face consultation)...(to) explain...(why the telehealth consult was) appropriate and necessary". By definition, "good medical practice involves using your expertise and influence to identify and address healthcare inequity and protect and advance the health and wellbeing of individual patients, communities and populations" <sup>8</sup>

This new obligation to make a subjective judgement, on whether a patient's needs are "appropriate and necessary", may weaken equitable access to healthcare in Australia. It is unclear why there is a burden on medical professionals to explain why they have provided care via care for a first-time patient, whilst there is no likewise obligation within these guidelines to explain the alternative. The threat of "protective actions" in section 1 Appendix A (under National Law) could disincentivise care which does not meet the narrowest and most severe understanding of "appropriate and necessary" for fear of the consequence.

It is further unclear to what point a patient's plea for help becomes inappropriate and unnecessary for medical care. This obligation carries an inherent distrust in medical professionals who are bound by their jurisdiction and code of practice to make good medical judgement.

There is clear and urgent public need for access to efficient online primary care models, that can leverage asynchronous text-based telehealth, along with telephone and video consultations, as part of a virtual first framework. Doctors must be trusted to utilise their professional judgement about the appropriate use of communication technologies needed to undertake a clinical assessment. Patients deserve access to doctors easily and efficiently and the autonomy to choose the mode of communication that is most personally and culturally appropriate to them. We need to urgently enable these solutions, not restrict them, so more patients are assessed by doctors when they need it, to make diagnoses and

prescribe medication outside of usual GP practice hours and ease the long unnecessary waits at the nation's overloaded emergency departments.

### **RECOMMENDATION:**

Do not restrict asynchronous healthcare.

Trust doctors to use their professional judgement about the most appropriate modality of communication.

Increase access to primary care in after-hours periods, particularly in rural and remote regions.

### Multidisciplinary team care models as the key to primary health care reform

*Clinical assessments can efficiently occur with the utilisation of multidisciplinary teams to improve care experiences and workforce utilisation. Regulations need to support technology enabled, multidisciplinary care - not restrict it.* 

Traditional primary care in Australia is stifled and strangled by chronic workforce and resource shortages. Supporting organisational and cultural change in the primary care sector is a key recommendation of the Australian Government's Strengthening Medicare Taskforce - 'to deliver person centred care as a principle that underpins a strong health system and ensuring that consumer perspectives are central to developing any changes to the system'. Further recommendations of the taskforce stress the importance of 'increasing access to equitable and affordable primary care ... that will require all governments to work together to enable legislative and regulatory barriers to practitioners working to their full scope'.

In a traditional primary care model, you see a practitioner in-person. Any healthcare must go through the practitioner. Care efficiency is limited as all aspects of the care interaction are forced to be undertaken directly by the practitioner. All patients have experienced the pain of traditional primary care -time spent waiting in a confined waiting room, just for the chance to spend a few fleeting minutes with the doctor. Team-based, technology-enabled care changes that.

If traditional primary care is failing to meet consumer needs what does an advanced primary care model look like? Advanced primary care goes beyond the traditional, basic delivery model. Advanced primary care augments traditional primary care, extending the care team to include the capabilities of care managers and coordinators, online practitioners, nurses, pharmacists, psychologists, social workers, and other allied health professionals. They expand the capacity of doctors by triaging, undertaking clinical assessments and information gathering, answering patient questions and addressing common obstacles like medication management or social care coordination, and ensuring that patient-specific care requirements are completed. Team members ensure that the doctor is informed and coordinating the care, reinforcing the full scope of the doctor as the leader in each patient's care journey. This model of advanced primary care improves patient centred experience, outcomes and doctor utilisation.

The key to shift from the current reality to a 'modern, digitally enabled and data driven primary care system' is enabling clinical teams to use technology in a streamlined and integrated way to deliver a comprehensive, personalized and continuous care experience. Regulatory barriers to multidisciplinary team care approaches must be removed from practitioners to unshackle workforce utilisation at local and regional levels – more key recommendation of the Strengthening Medicare Taskforce. Empowering technologyenabled care teams will relieve clinical and operational burden on traditional medical services - GPs and Emergency Departments can assist more people and transform the care experience for millions of Australians.

### **RECOMMENDATION:**

Do not restrict multidisciplinary care - allow care to be delivered by a clinical team with the practitioner being ultimately responsible.

### Direct consumer feedback - The impact of a restriction on online prescriptions

"Culturally appropriate healthcare is defined as care that recognises the social, political and economic factors that affect health and access to healthcare, and care that considers dignity, privacy, and safety, reducing the chance of discrimination"<sup>9</sup>. This is echoed in the 'Good medical practice: a code of conduct for doctors in Australia', which calls for "selfdetermined decision-making, partnership and collaboration in healthcare which is driven by the individual, family and community"<sup>8</sup>.

Medmate surveyed 2000 virtual care patients to gather feedback and insights on the Medical Board of Australia's proposed restrictions to medication prescription renewals via online questionnaires.

OBJECTIVE - To seek direct consumer feedback about the use of asynchronous online prescription services and feedback on the Medical Boards proposed restrictions for online prescription services.

DESIGN/METHODOLOGY - 2000 users of the Medmate virtual care platform were surveyed through an auditable online exit questionnaire with structured questions about their use of the online prescription service and provided the opportunity to provide direct feedback to the Medical Board about proposed restrictions.

Reason for using the Online Medication Service	<b>46%</b> - Unable to get an appointment with my GP
Preferred way to request a medication renewal (Online medication request, speaking to a doctor face to face, telephone or video consult)	<b>62%</b> - Online medication request
Key benefit of an online form request over a face-to-face consult	<b>77%</b> - More convenient as it's hard to get a doctor's appointment at a time that fits with my availability
Impact on health if I was unable to renew my medication online	<b>40%</b> - Would run out of their regular prescription medication and their health condition(s) would worsen
Impact on maintaining regular medication regime	<b>74%</b> - Less likely to maintain their regular medication regime due to the proposed restrictions
Do you consider yourself to be in a vulnerable group?	<b>48%</b> - Identified as being in a vulnerable group (Mental health condition, disability, rural area with limited access to doctors, LGBTQIA+, ATSI)

**KEY FINDINGS -**

Why have you used an online medication service from a previously unknown doctor on the Internet?	
I am unable to get an appointment with my GP	46%
It's more accessible for me to complete an online medication request than speak to a doctor	22%
I currently don't have a regular GP	11%
It's too expensive to see a GP	10%
I feel uncomfortable speaking with a doctor and more comfortable completing an online medication request	5%
I have a mental health condition and I am more comfortable requesting medication online than speaking to a doctor	3%
I have a disability and it is simpler and more accessible for me to request medications online than speak to a doctor	3%

What is your preferred way to request a medication renewal?	
Online medication request	62%
Speaking to a doctor in a face-to-face appointment	18%
Speaking to a doctor in a telephone appointment	15%
Speaking to a doctor in a video telehealth appointment	5%

Do you consider yourself to be in a vulnerable group?	
Not in a vulnerable group	53%
Mental health condition	16%
Disability or severe chronic medical condition	13%
Living in a rural area with limited access to doctors	10%
LGBTQIA+	4%
Aboriginal or Torres Strait Islander	2%
Other	3%

What do you believe are the benefits of an online form request for over speaking to a doctor in a real-time appointment?	medication
Online form requests are more convenient as it's hard to get a doctor's appointment at a time that fits with my availability	77%
Online form requests make me feel more comfortable answering questions truthfully in a written format rather than speaking to a doctor	
Online form requests give me more time to understand the doctor's questions and provide the correct answers for the doctor's assessment	7%
There are no benefits of an online form request, I prefer to speak to the doctor	

Do online medication requests (versus speaking to a doctor) make it more or less likely that you will be able to maintain your regular medication regime?	
More	74%
Less	3%
Neither more nor less	23%

If I was unable to renew my medications online, the impact on my health would be:	
I would run out of my regular prescription medication and my health condition(s) would worsen	40%
I would have to incur a cost (financial, travel, time, inconvenience) to access a GP in another area	33%
No impact, I can get an appointment with my GP before my medications run out	19%
I would have to present to a local emergency department for a prescription renewal	9%

# Tell the Medical Board what you think about the proposed restrictions to online medication ordering. How will restrictions impact your health and your choice as a consumer? (*Unedited responses from individual patients*)

"I live in a rural community, and it can take anywhere up to a month to obtain an appointment with a GP. The nearest towns to us have the same problem and will not accept new patients. The only other option is the public hospital an hour away, which then overloads our public health system, which the government continually whinges about anyway." - Neville

"Australia has a massive GP shortage so removing the ability of patients to access online medication ordering and instead forcing them to try and access overworked and unavailable GP's makes absolutely no sense. They would be making the problem a million times worse. What on earth are they thinking?" -Narelle

I am unable to regularly and reliably access my preferred GP. I have severe anxiety leaving the house due to a number of conditions including my disability. I sometimes struggle due to this to maintain my health, online scripts mean I don't suffer negative affects of not having my medications and can function more normally. It helps improve my health and quality of life. - Meg

"As we don't get appointments with GP so easily (sometimes a 3 week wait), it would have a considerable impact on my health and choice." - Cleon

\*More feedback in Appendix A

### **OUR KEY RECOMMENDATIONS**

### **Recommendation 1**

We recommend that the sections regarding prescribing are removed to allow time to undertake an independent assessment of Australia's digital health sector, including online prescribing impacts and benefits. Specifically, we recommend that Option Three (Revise the Guidance) with the removal of the entire section regarding "Prescribing without having consulted with the patient" be adopted.

We welcome a constructive process with the Board, working in conjunction with an industry forum of stakeholders, about workable safeguards and guidelines to enable ongoing access to asynchronous healthcare.

### **Recommendation 2**

We recommend a Parliamentary inquiry into the future of digital health in Australia with the following terms of reference.

- The use and uptake of digital health technologies and virtual care pathways by patients, health care providers, and the broader health system, including an assessment of their effectiveness in improving health outcomes;
- 2. The benefits of digital health, including its impact on patient outcomes, the reduction of health care costs, and the alleviation of pressure on traditional healthcare services including primary care, emergency care and hospitals;
- The role of the government and the private sector in driving innovation and the development of new digital health technologies, including an examination of incentives and regulatory barriers to research, develop and commercialise novel digital healthcare pathways;
- 4. The delivery of digital health services in rural and regional Australia, including an assessment of the current barriers and enablers to the effective delivery of digital health services in these areas;
- 5. The potential for emerging technology, including Web 3.0 technologies, the internet of things, blockchain, machine learning, artificial intelligence and extended reality to bring about efficiencies and reduce costs in the delivery of health services in Australia, and the policy settings required to launch a domestic research and development industry to build and implement these technologies across the healthcare sector;
- 6. International best practice and its potential to inform the future development of digital health and service delivery innovation in Australia.



Dr Ganesh Naidoo Bsc (biomed), MBBS, FRACGP CEO and Medical Director

### About the Author

Dr. Ganesh Naidoo BSc(biomed), MBBS, FRACGP is an Australian General Practitioner based in Melbourne, Australia. He is the Medical Director of Medmate, a national virtual care platform.

Ganesh graduated medical school from the University of Queensland prior to residencies at The Alfred Hospital and Monash Medical Centre in Melbourne. He established his own medical practices in Cairns, Far North Queensland and served patients from many communities throughout the Cape York Peninsula. After ten years, he moved back to Melbourne where he consults today.

He holds a Bachelor of Biomedical Science from <u>Monash University</u>, a Bachelor of Medicine and Surgery from the <u>University of Queensland</u>, a graduate of the General Management Program from the <u>University of Cambridge</u> and a fellow of the <u>Royal</u> <u>Australian College of General Practitioners</u>. Dr Naidoo previously held senior executive roles as Head of Primary Care for <u>Fullerton Healthcare</u>, National Medical Director for Health & Co (a division of <u>Healius Limited</u>) and Senior Clinical Advisor to the Australian Defence Force. Ganesh is passionate about the importance of Australian digital health transformation.

### <u>About Us</u>

Our mission is to connect every person, everywhere, to the healthcare that they need.

We believe all people have a right to access healthcare when and where they need it. We know how hard it can be to access healthcare, particularly in afterhours periods or if you live in a rural area. We also know that even in metro locations it can be really difficult to see a local GP. We had to make it easier for every Australian to access care and stay healthy. That's why we built the Medmate virtual care service.

Medmate clinic is linked to Medmate Pharmacy Delivery (over 1000 pharmacies nationally) with many patients choosing to get their online prescription dispensed by a local pharmacy and medication delivered to their home within the hour.

We believe our virtual care service keeps Australians healthy, in conjunction with ongoing care with your face-to-face GP, empowering you to take control of your health.

Medmate serves every corner of our country.

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### **APPENDIX A - PATIENT SURVEY**

Medmate surveyed 2000 virtual care patients to gather feedback and insights on the Medical Board of Australia's proposed restrictions to medication prescription renewals via online questionnaires.

OBJECTIVE - To seek direct consumer feedback about the use of asynchronous online prescription services and feedback on the Medical Boards proposed restrictions for online prescription services.

DESIGN/METHODOLOGY - 2000 users of the Medmate virtual care platform were surveyed through an auditable online exit questionnaire with structured questions about their use of the online prescription service and provided the opportunity to provide direct feedback to the Medical Board about proposed restrictions.

## Tell the Medical Board what you think about the proposed restrictions to online medication ordering. How will restrictions impact your health and your choice as a consumer?

### Sample of unedited responses from individual patients January 2023

"Don't cut this service please. It's super helpful. I'm on the same medication for years. When I need a change or a review I see my regular GP. All the other times it's very helpful to be able to get a renewal online." - Victoria

"I live in a rural community, and it can take anywhere up to a month to obtain an appointment with a GP. The nearest towns to us have the same problem and will not accept new patients. The only other option is the public hospital an hour away, which then overloads our public health system, which the government continually whinges about anyway." -

"As we don't get appointments with GP so easily (sometimes a 3 week wait), it would have a considerable impact on my health and choice." -

"Australia has a massive GP shortage so removing the ability of patients to access online medication ordering and instead forcing them to try and access overworked and unavailable GP's makes absolutely no sense. They would be making the problem a million times worse. What on earth are they thinking?" -

"Online medical prescriptions have been a god send for me to maintain my daily medical

needs and not run the risk of running out. It's extremely hard to get into the GP currently more than 3 weeks wait and if I don't realise how low I am it means not being covered for a period of time before I can see a doctor. My prescriptions are not life or death so wouldn't clog ED for that." - **The South Wales** 

"I would run out of my mental health medication and be at risk of serious deterioration – I am a bit chaotic and always running behind on things so would struggle to also fit in going to the doctor to get a script when I suddenly realised I had run out. Being able to get script refills online has helped me manage my condition better than I would otherwise." - Western Australia

"I live in Albany and cannot always see a GP when I need prescriptions resulting in me running out of medication and potentially becoming extremely unwell. Getting prescriptions online is easier for me as I do not have to wait weeks for an appointment and I do not need to deal with anxiety and panic attacks about having to sit in a doctors office with a hundred other sick people." - Western Australia

"I have used the online services mainly for script renewals of existing issues. It is both increasingly difficult to see the GP in person and more expensive due to the increasing element of additional charges above the Medicare rebate. At a time such as this it is wrong, and even paternalistically restrictive to make it even more difficult to get simple script renewals for existing conditions. For a while I could order script renewals online from my GP and pick them up at the surgery. That function has been taken down. At present I have to wait at least 2 weeks or more to make a booking with the GP in person." New South Wales

"I highly recommend Medmate to anyone needing an online doctors service I am extremely deaf and struggle to hear on a phone and the 1st time I used this service I used the online prescription and received an escript within 15 minutes and tried to use the service a second time and was told I needed to make an appointment being extremely deaf I can hardly hear on a phone so they were amazing and the doctor did the consult via text message and sent through my escript I then used the same service via text message and once again was amazed." - Mew South Wales

"Online requests have made my life so much easier, I'm not waiting up to 2 weeks to see a doctor or spending 1 to 2 hours waiting to see a doctor, and gives doctors more time to see urgent need patients rather than continuing to use their time to renew a prescription. Medmate is so much more practical and convenient for someone with my condition and in my situation. For me, restrictions would only be detrimental." -

*"With the shortage of GPs currently, these restrictions would be catastrophic for the community."* - **The state of the community.** "- **The state of the state of** 

"People need options! There are simply not enough doctors to support the amount of patients. We need creative alternatives like online script renewals! Don't keep us in the dark ages." - **Mathematical South Australia** 

"Please do not restrict online medication ordering. I required antiviral medication urgently at a time when I could not get an appointment with my GP. I received a call from the doctor who issued the prescription, so I felt reassured. Excellent and convenient support and I know that in different circumstances it would take the pressure off my local medical clinic." - Anon

"Restrictions mean accessing medications for my disabled daughter will be almost impossible due to trying to make an appointment with an available gp who will prescribe what she takes, it saves waiting months for a hospital review." -

"I am an Aboriginal woman from a regional area with a chronic illness - I have high medical costs to manage this illness. Going to the GP every 3 months to get something like my birth control renewed feels ridiculous - an expensive waste of both my and my GPs time, when I'd rather only see them as needed to manage more serious conditions." -

"I live rurally and there is one clinic within 45 minutes of me. It's a nightmare to get an appointment to renew the script for my anti depressant and a further nightmare getting there. If this is restricted, I will struggle to access the medication I need and will no doubt end up in hospital." - Queensland

"I am unable to regularly and reliably access my preferred GP. I have severe anxiety leaving the house due to a number of conditions including my disability. I sometimes struggle due to this to maintain my health, online scripts mean I don't suffer negative affects of not having my medications and can function more normally. It helps improve my health and quality of life." -

"A standard face-to-face appointment is always fast, and I feel I forget important information in the rush. I am also aware what medicines work for my long-term chronic condition. It is also difficult to get timely GP appointments to get a prescription to address flare ups." -

"Absolutely ridiculous. I understand that there are people that may abuse the system with online scripts & that is such a shame as many such as myself who have agoraphobia which means going to the doctor is an extremely difficult task. Also I have a job that allows me to work with my condition & I rarely have to interact with people, however I work very long hours & all my spare time is for my kids & sleep. Not lining up at doctors where I consider it to be completely unnecessary." -

"Access to GPs is increasingly difficult in Australia due to several factors, including reduced appointment availability and reduced fully bulk-billing services for people without a healthcare card or other concessions. In my city, I can no longer access a completely bulk-billed appointment at a convenient time. In this context, online medication services are the most accessible for me." -

"Accessibility is my number one criteria. The most accessible means to get a script is either telephone or online. I have a repeating script that takes one minute to do and fail to see why I must waste so much time going to see a doctor for the same thing over and over." -

"Allowing me to fill simple repeat scripts online means more capacity for in person GP consults for situations that require this level of care. I see my GP when needed but in

between if my birth control script is out it's more convenient to get repeat online. This means less time wasted for me and my GP practice. A win!" -

"Allowing people, the convenience of online medication ordering means that people can access the medications they need from home when it suits them. Not being able to access online medication would be detrimental to many people who might not otherwise take their medication if they are having to wait to see a GP in person or unable to get a face to face appointment."

"Allows people to maintain their medication regime when access to their GP is not available. Taking this away is going to impact emergency departments who are already struggling." -

"Although I am fortunate enough to have access to a kind GP via Telehealth I know that for many people online medication forms are essential. Telehealth changed my life and made it easier for me to keep in regular contact with my doctors - because leaving my home is difficult due to my mental illness and the cost of travel can be prohibitive. I think that online forms offer the same lifeline to many people. Please make life easier for the most vulnerable members of our communities. Life is already so challenging for those of us who are disabled or otherwise marginalised. Why would you take away a service provides a safe, convenient and accessible way for people to access the medications they need?"-

"Am a gay male living with HIV and I don't feel comfortable talking face to face with all doctors so I'm less likely to seek medical help etc." -

"An appointment at a regular GP is so hard to get, I work full time. With the lack of ability to get an appointment outside of 5pm, I must take leave to see the Dr for a prescription I need each month." -

"Another example of ridiculous restrictions imposed for reasons unknown but likely to prevent a minority doing the wrong thing and ultimately impacting the majority trying to manage their health, time, lack of medical access and finances." -

"Any restrictions will greatly impact the ease with which I can currently manage my regular medications. It will also impose an additional financial burden on me as a doctor's appointment is far more costly." -

"As a consumer and parent, the struggle to get an appointment with a GP is real. Unless the medical board can petition the government to make working as a GP more attractive, thus increasing GP numbers, then an alternative is required. If you remove that alternative, all that will mean is even less chance of getting a timely appointment. Some GPs are booked out 4 weeks in advance. Can someone really go 4 weeks without their medication?" -

"As a consumer the time when I was staying in city, GP was easily a place to visit in case of sickness. Now moving to outskirts of Melbourne where there is limited public transport and limited doctors and I am not able to drive, haven't been to any doctor yet. Finding it such a hassle to find and go to doctor. I prefer inline medication request as a convenient form for anyone." -

"As a full time worker with an hour commute twice a day making an appointment with the GP to only renew a prescription is inconvenient. With GP's under strain, it makes no sense for someone like me to take up an appointment when others need it more urgently." -

"The removal of this convenient option would result in further time off work to attend appointments in working hours or impact on my children's activities. The requests are for existing medications that I have been taking for many years, this seems like a no brainer especially given the shortage of doctors." -

"As a person living a rural area & working long hours at times online is best for as can get assistance online for non-emergency health issues easier in many ways & cheaper than attending appointments." -

"As a person living with chronic illnesses, having access to my regular medications is vital for me to be able to function. I quite often run out due to lack of money, or not being able to make an appointment in time. Online prescriptions are far more accessible to those of us who find it more difficult to get out and about." -

"As a person that lives in a remote area and shortage of doctors it would affect me a lot due to it taking up 2 three weeks to see a doctor." -

"As a rural resident and also a full-time carer it has become an essential means for myself to obtain the prescriptions and renewals that I need regularly. If the Drs need to talk to me, they then call me when it's convenient to discuss before issuing a prescription." -

"As a small business owner and a stay-at-home mum- it impacts my health greatly. Now I have to bring my four year old to the doctors, and risk him getting expose to sicknesses just to get my own medication."

"As a student, I really dread having to pay \$30 every few months to see my Doctor for a repeated prescription that honestly takes two minutes. I would much prefer being able to do online and have my doctor call if they needed to contact me regarding my health and the medication." -

"As a working professional I struggle to find time to visit my GP - restrictions on this would mean that I miss out on my daily asthma medication (which only lasts me 2 weeks with a Seretide inhaler used BD) which adversely affects my ability to work as a healthcare professional." -

"As access to GP services are so limited it is very convenient to be able to get regular prescription medication online and this should not be dictated to us by the government."

"As an immunocompromised person i need to be able to get in and out quickly at my GP or do a telehealth consult which are both getting harder to achieve so an online prescription helps people like me who are housebound for health reasons." -

"As I am a diabetic the online medication ordering is an effective way for me to access my necessary medication if I cannot access my regular GP such as holiday closures, unavailability of urgent appointments." -

"As I suffer with severe anxiety I can no longer drive. I rely on family to get me to my usual GP. This is not always convenient for them. Plus, it's so hard to get an appt with my GP. She is booked out 6 weeks in advance. Being able to request repeat prescriptions and prescriptions for minor illness such as antibiotics for urinary tract infections etc has just made my life so much easier. Reports are sent to my GP so we can follow up on things. It's been a godsend for me and my family. I was recently up in the WA outback and was able to get a prescription for UTI. Otherwise, I would have been in agony and would have had to be driven hundreds of kms to nearest hospital."

"As my doctor is highly sought after and regularly booked out in advance, it makes it easy to be able to get my medication online if my script runs out. My mental health is dramatically impacted even if I miss a day or two if my medication." -

"As someone who has extreme social anxiety, the ability to request my regular prescription medication online is incredibly beneficial. It would cost me more if I was to have to book in and then attend a doctor's appointment in person." -

"As someone with a chronic condition that relies on medication to be alive, I need to have access to refills of my meds but also be able to get them easily as I do not live in a convenient area for doctors anymore. Online/zoom has literally been a life saver for me." -

"As someone with Mental Illness and physical issues, it can be difficult to find a time where both my physical and mental health is good enough to go to an appointment or talk to someone on the phone. This service makes it so I can continue my meds safely." -

"As someone with various mental health conditions who takes needs to take medication every day, online script prescriptions are a life saver. I have adhd and can often forget to renew prescriptions in time - which leaves me in danger of going through withdrawals and a worsening of my conditions. My main prescriptions come from appointments with my regular medical provider, but I often use online scripts as a "bridging medication" to get me through until my next appointment if I've run out of a certain script. Appointments with my normal medical provider are not always easily available, and recently GPs have been increasing their fees, so the option to get a script quickly and cheaply is incredibly helpful. If restrictions were put in place, I believe my health would suffer from not being able to easily access prescriptions I need." –

"As someone wo suffers from severe anxiety and depression, I often find it difficult to even leave the house at times. Sometimes the mere thought of having to go to the doctors to get my medication renewed makes me ill and I will worry about it for days. I hope further restrictions aren't imposed." -

"Being able to get a repeat script urgently over the New Year's break was a god send. We would have had to take Dad into Emergency without this service." -

"Being able to request a new script/repeat online makes things so much easier and I don't have to pay \$100+ just for a piece of paper (when nothing has changed and does not require a full re-assessment of my ongoing condition), to then allow me to spend \$100+ on my current prescription." - "Being in a rural area, the ability to renew a script for regular medication assist me greatly. My doctor is always busy & booked out weeks in advance. Having the access to online script renewal frees up my time & allows my doctor appointments for other more issues & patients." -

"Best thing that has happened is access to online medications. Can never get an appointment in person. Don't get rid of online. It is needed more than ever right now." -

"By adding restrictions to the online medication ordering, it will impact many people negatively. When you are on regular medication that you know you must take (such as myself for life), it is a massive inconvenience and cost to see a doctor for the prescription. I am essentially going there to pay money to tell someone what I need, when it is something, I have to take. It takes time and money from me, and I am sure plenty of other people, and with the costs of living at the moment, it is unfair." -

"By limiting access to repeats, and telehealth medicine patients are forced to either go back in the queue for a GP appointment which may or may not materialise or go without their meds." -

"By restricting online ordering my ability to schedule and use my time efficiently will be impacted. It'll mean more time spent away from family and work and more time driving to doctors' appointments and pharmacies." -

"Can't get to the dr. in rural area because they are always booked out using online ordering for required items makes sure I always have my medication." -

"Choice for the consumer should be important, especially for low-risk areas such as medicine renewals."

"Considering it was the government's actions that we have less doctors I think at the very least, we should be able to get prescriptions." -

"Could mean I would not be able to work or look after my family due to medical episodes." -

"Depression affects my ability to self-present to my GP for medication renewals, online practices make it significantly easier." -

"Despite my best-efforts access to my regular GP has become more difficult recently, he is busier than ever and if I couldn't get an appointment to get my repeat script and was unable to get an online appointment, I would be hospitalised." - Bec "Doctors are charging more, and it's costing more and more when getting repeats." -

"Due to scarce availability with my regular GP it will greatly impede my ability to access a quick, secure and safe method of having a consultation and also for ordering my prescriptions." -

"Due to the ongoing effects of Domestic Violence and the recovery process for me, some days are easier to function than others in daily life tasks. Anything that can simplify my life is welcome, as I am needing Psychologist sessions and other interventions to recover. The convenience of online medication ordering for me is enormous as it frees my time up for other necessary things on my road to recovery. Sometimes I must wait many days for a GP appointment, and often forget to have prescriptions updated on that visit, as I have various other health needs" -

"Due to the time restrictions and GP shortages, it is convenient for me to ask for a script on line. I do not have to take time off. I can schedule GP apt for pathology every 6 months and only need to take time off at this time. I recently had COVID RAT positive on a Public Holiday. Could access Antivirals online and commence them same day due to on line medication request thereby assisting my recovery".

"Each and any way patients can obtain convenient, cost effective, and timely access to medical professionals for whatever purpose, should be promoted and not removed." -

"Each to his own - every patient r should have the right to choose how they get theirs medications." -

"Easier, more convenient, and comfortable using an online medication ordering system, especially if *you are aware of the medication script and have taken it before. I am a medical student. I would rather use an online system than waiting at the GP for hours on end for a 1 min consult. Do not take away the right for millions of people who have easier access to this rather than doctor's who waste our time in their offices. Especially for repeat prescriptions as we have been taking the medication before. It is a lot of time out of someone's day to take time off work, go to a GP, wait for hours for them to see you only to take 1 min to write you a script." –* 

"Empower people with ease to medical requirements easily and create less barriers to supply and less pressure on the medical system." -

"Finding a bulk billing DR is already hard then having to wait for an appointment in order to get my medication regularly I don't currently have a car so the convince of get my prescription from telehealth then having them delivered means I take my medication regularly with no complications later on." -

"For several years now in the area where I live, we have had a huge shortage of doctors. Since my old doctor retired, I have had a lot of trouble getting in to see a doctor for script renewal. This service allows this to happen more easily and significantly cheaper than a normal doctors visit which in my situation is greatly apricated." -

"For a working (including FIFO) mother of three children, with a chronic health condition, the ease, convenience, and ability to get a script at any time is so important to me. Restrictions would severely hamper my ability to get scripts / repeats as required." -

*"For me it's more financially friendly and easy to get my contraceptive medication online, rather than having to see a GP every time I need a renewal." -* 

"For ongoing chronic medical conditions this is a cost effective and convenient way of getting meds. I don't have a car, have a condition which makes this ideal. For new health issues I go to a face to face doctor." -

"For regular long-term prescriptions (such as the contraceptive pill in my case) I should not be required to pay a GP \$80 in order to obtain a renewal script. This is a prescription I have held for over 15 years, and I do not need to sit in a waiting room, taking up valuable GP time that could be best used seeing patients who need a consult, or my own time. Nor should I be expected to pay an additional fee for something I already know I need (and one which works for me.)" -

"For someone who has crippling anxiety and agoraphobia it makes it extremely hard to leave my home for medical appointments let alone medication refills and scripts". -

"For the medication I need, this is an easy and convenient way to get it. Online ordering means I am not taking up time from my doctor thus allowing someone with a more complex issue to get an appointment." -

"Getting an urgent GP appointment can be next to impossible in holiday periods and weekends. For something that is noncritical like what we have used on line renewal for, this service fills the major gap. A gap that sounds like it is going to get even worse. What is the Govt motivation to restrict this even further? Quite shocking really." -

"Getting more difficult every day to see a regular GP, and waiting times are ridiculous. At least on-line allows a temporary gap in between needing to see a doctor." -

"Getting my meds from Medmate has been the best thing as I am a professional and have no time to go and visit a GP and can't get an appointment easily." -

"Getting to a doctor that is available is near on impossible. Without online medication ordering, it would be a huge impact on my health and my families." -

"Given the shortage of doctors, ANY restriction of access options will just make things worse and put more burden on GPs that are already exhausted. Look for ways to EXPAND access!" -

"Given the shortage of GPs and availability I think for the purpose of a prescription renewal the online service ensures I have access to my medication which if I run out of gives me significant withdrawal effects. This should be available to all Australian consumers." -

"Good for renewal or repeat scripts and for when you can't get into your doctor because they are closed or no appointment available." -

"GPs are difficult to access, expensive, and inconvenient for something such as a routine repeat prescription. Fundamentally believe in visiting a doctor when a health concern or condition develops, as well as on a periodic basis when needed to check on my condition however something like a prescription is often too frequent and an impost on both the patient and the medical system which then makes it more likely that a preventative medication becomes inaccessible, and a condition goes untreated or worsens. Medication, unless high risk, should be as accessible and convenient as possible." - "GPs are very hard to see and almost always booked out for a few days at least. By this time, mine or my child's condition could have deteriorated compared to receiving and starting medication within that timeframe. It's also too costly, with constant sickness from young children attending daycare, to see a GP all the time for reoccurring illness." -

"Having a number of regular prescriptions for allergies, asthma and female issues I find it difficult to get appointments with my regular doctor for repeat scripts. Online medication restrictions will mean I will sometimes run out of my medications." -

"Having access to online orders has allowed me to get scripts when I couldn't get a GP appointment." -

"Having an auto immune disease that requires monitoring it's much easier to do it online for my regular prescriptions and keeps me safer from getting covid having to go into a practice. And that is more expensive for me as well." -

*"Having choice and convenience of online ordering is paramount to maintaining a consistent medication regime. Taking this option away when it's hard to get appointments with a GP could be detrimental to mine and many others health." -* 

"Having constant repeat prescriptions and wasting hours of my time sitting at a doctor takes the happy out of life. To online order gives me control over what I do and how I spend my time." -

*"Having the flexibility to get as much of my medication when needed simply allows me to be able to plan ahead & not panic." -*

"Having this facility available is life changing. At present dr. appointments are impossible to get, except if you want to book 2 weeks in advance. We need the ability to access medicine and doctors, Medmate is a perfect way to do this. Also, fantastic if you aren't well enough to get to a doctor. I don't know why they would want to stop this." -

"Having to take the time out of the day for a 2 minute meeting with a doctor just to say "can I please get my prescriptions refilled" and then they say yes and print them out and I leave. It is even worse when you must sit in the waiting room for an hour past appointment time just for a 2 min appointment." -

*"Here on holiday for approx. 3 months so online prescription facilities suit my needs while in Australia." -* 

"Honestly this could save lives. Having to book into a doctor to see me whilst fitting it in around my work hours can be stressful. Let alone the times when I do run out of medication due to lack of repeat script or whatever the case may be. It literally happened to me last week where I ran out as the doctor failed to send through a repeat script, so I was extremely distressed trying to get in to see someone. This cost me time off work as well. Had I'd known online medication was an option, it could save a lot of stressed and anxiety. Having to be on multiple medications consistently is a hassle and expensive as it is let alone paying to see someone each month." -

"I am a carer for my autistic daughter, I have mental health issues. Not being able to access the scripts online will really make life hard for us." -

"I am a type 1 diabetic. Getting an appointment with my endocrinologist takes a lot of time. Usually, a 3 month wait. Online medication makes it much easier to keep control of medication supply." -

"I am an extremely busy man. I am not a vulnerable person however I do rely on medication for pain free life. Consider the vulnerable as the upmost priority but also consider the convince of online medication ordering for the busy working-class man that is full time employed and trying to make time for family as well." -

"I am career of a bed ridden partner and work full time, so my health takes a back seat to my responsibilities I don't have time to see a GP every time. I need this service I would rather die than live life without my medication." -

*"I am currently at university full time and working 2 jobs to support myself during my studies, the proposed restrictions would severely hamper my ability to access the medications I rely on as it's difficult for me to find a time to see a GP with my schedule." -*

"I am currently taking 7 different medications, two of these require authorisation. If I need certain prescriptions in an emergency, I would not be able to gain all/certain prescriptions on request. This could very well leave me with excruciating pain." -

*"I am currently unable to get doctors' appointments months in advance without these services, I am unable to fulfill my prescriptions when I need them." -* 

"I am extremely deaf and really struggle to hear on a phone the 1st time I used Medmate online prescription request was great I found filling in the medication request form was easy to follow and it gives you time to read and answer the questions from the doctor without feeling like you need to hurry up and being extremely deaf and unable to hear well enough on a phone for a telephone consultation I was able to access the medication I needed without the added stress from trying to hear well enough to speak with the doctor so for people like me who are deaf or have a disability and find it extremely hard to speak with a doctor via a phone call it is extremely helpful as it can be very upsetting and stressful trying to hear on a phone. I think if the system was to be changed and there is no longer any way available for you to access medication needed. I think it would leave a lot of people unable to access the medication they need which can be a really bad thing hopefully they will realise that the online prescription request access is an incredibly important part of health care these days. If I could tell them myself the benefits from this service is definitely needed and how bad it would be for so many Australians if it is no longer available I would hopefully be able to get them to understand the importance of online prescription request forms." -

*"I am finding it more difficult to get a date to face consultation with my GP so having the option to get a script online is beneficial." -*

"I am immunocompromised and am on 27 regular medications daily. to be able to get a script for these as they run out - would be so simple to do online - i also use a computer daily - so it would be even simpler. This would save the services of busy GP's when my medication does not change that much at all." -

"I am lucky enough to have been able to push through my mental health issues to see doctors and renew my medication. I can think of so many reasons why this is such a challenge for people. Restricting access is not the path we should be taking." -

"I am regularly unwell and on a low income. Particularly as a student, this service meant my condition didn't deteriorate to the point where I needed emergency care and was relatively affordable compared to seeing a GP. On Austudy, a GP appointment would often mean I'd have to go without buying fresh food for that fortnight or fall behind on rent or bills. With an online form for simple medical requests and a much lower fee this meant I had more money free for other living costs. These are not a replacement for a doctors appointment when things get worse or a new condition arises, but are a lifeline for those with a low income and lots of medical costs and ongoing issues that can be managed by these services." –

"I am single parent who works full time, I have limited availability to attend a clinic, limited funds to pay for appointments and the appointments just aren't there to be booked. I can never see my GP and the other Drs are always booked out." -

"I am uncomfortable going to a doctor's office and exposing myself to Covid and other contagious illnesses for no good reason. It also wastes the time of the limited GP's we have when they could be with other patients that need an appointment. I work very long hours and find it inconvenient and costly to take time off just to renew medication I've been on very long term. I monitor my blood pressure at home very regularly as I can't have it taken at the doctor's office due to "white coat" syndrome and I have annual blood tests to check general health and monitor my very long term thyroid condition. I take full responsibility for my own health and choosing to renewal of my regular medication online. It is convenient, less costly, much less stressful for me and ensures I don't run out of my medication." -

"I am writing to express my concerns about the proposed restrictions to online medication ordering. I am worried that these restrictions will have a negative impact on my health and my choice as a consumer. Without access to online ordering, it will be more difficult for me to find medications at an affordable price, or even know what the best option is for me. Additionally, the process of getting medications in-person may take longer, causing delays in treatment, which could lead to worsening health outcomes. Overall, I believe that these restrictions could ultimately harm both my health and my rights as a consumer."

"I am on lifetime mix of medication for auto immune disease, crest, arthritis and Raynaud's disease I am under specialists my gp is kept informed by them so I only require scripts that can be confirmed with specialists if required by online services otherwise I am basically paying the gp out of pocket every time for a script that he can't change to the tune of \$40 per script only and then have to purchase the medication. I am 68 years of age, and this is not right."

"I believe this to be an important portal for access to prescriptions as I rang 6 or more different medical centre's/Dr's & not one could help me or fit me in & this was far better than clogging up the already overloaded emergency dept's ....this service is an absolute must & so simple & streamlined ....a win, win for everyone." -

*"I believe this will impact huge groups of people. I believe people use this service because they know and manage their health and don't necessarily need to see a GP for a* 

simple script. Also as an emergency nurse it places a huge burden on our service when people come to emergency requesting scripts." -

"I believe vulnerable groups, those with anxiety or simply uncomfortable with speaking to a doctor about their issues will suffer because of being unable to get a prescription filled if there are further restrictions to online medication ordering. This is a potential backwards step making accessibility more difficult."