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To: [medboardconsultation](#)
Subject: Consultation: revised telehealth guidelines
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Dear Dr Tonkin and Board Members,

Thank you for the proposed revised telehealth guidelines. There is one area that, in context of the surrounding text, reads as unclear (p9, point 2)

2. Have access to secure, reliable technology and connectivity that:

a. is fit for clinical purpose

b. is not a personal account

c. allows for secure access to patients' clinical records; and transmission and storage of prescriptions, referrals, investigation requests and photographs/ images

I presume this highlighted section is intended to mean a mixture of technologies (e.g.local notes database and fax/registered mail for scripts) rather than requiring a single platform that provides all these features. If so, even making the word technology plural (*technologies*) or using the phrase "mixture of technologies" would be worthwhile. After all, telehealth consultation recorded on paper notes with a typed letter should not really be unethical.

If, however, the intention is for all these things to be under a single platform, or for there to be a requirement that all aspects are electronic, then few practitioners will be able to meet the standard. No Victorian public hospital has outpatient E-scripts, for instance. Fax and mail is universal.

It is also not clear that this section adds to "*fit for clinical purpose*". For most purposes it is difficult to argue that facsimile of referrals and investigation requests would represent a deviation from standard, in person consultation. Similarly for postal delivery of correspondence. Adding additional requirements on to telehealth over and above face-to-face appears un-necessary and, if not intended, should be clarified.

Hopefully I have made myself clear about what I was unclear on,

Best wishes,
Dr Saul Mullen

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