SUBMISSION BY THE PHARMACEUTICAL SOCIETY OF AUSTRALIA TO THE AUSTRALIAN GOVERNMENT’S DISCUSSION PAPER ON CONNECTING HEALTH SERVICES WITH THE FUTURE: MODERNISING MEDICARE BY PROVIDING REBATES FOR ONLINE CONSULTATIONS

PURPOSE

1. The purpose of this paper is to convey the perspectives of the Pharmaceutical Society of Australia (PSA) on proposals to modernise Medicare by providing rebates for online consultations across a range of specialties and by broadening the types of sites in which such services may be provided.

ABOUT PSA

2. PSA is the peak national professional pharmacy organisation representing Australia’s 25,000 pharmacists working in all sectors and across all locations.

3. The core business of PSA is practice improvement in pharmacy through the provision of continuing professional development and practice support. PSA provides an extensive program of education and professional development activities across Australia, including a National Intern Training Program. PSA’s Practice Support program offers pharmacists and pharmacies practical solutions and assistance to support them in the shift toward improved professional practice and increased implementation of health care services.

4. PSA represents and advances the professional interests of pharmacists working in all areas of the health system: in the community, in hospitals and as independent consultants and exists to support its members through the development and expansion of the profession.

COMMENTS ON THE DISCUSSION PAPER

5. In canvassing issues around optimal practice models, the Discussion paper notes that online consultation facilities could be located in a pharmacy. However, as the peak organisation representing Australia’s highly-trained pharmacists (4-year degree plus an intern year), PSA is profoundly disappointed to find a statement in a paper issued by the Department of Health and Ageing suggesting that a pharmacy is a building “not usually used for patient care.”

6. The provision of patient care is the fundamental activity undertaken by pharmacists in pharmacies. This is stated clearly in pharmacists’ Professional Practice Standards: “the primary responsibility of a pharmacist is to ensure safe and effective use of medicines and best possible health outcomes for consumers through the provision of pharmaceutical care.” This is also reflected in the latest Australian

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1 Connecting health services with the future: modernising Medicare by providing rebates for online consultations: a discussion paper from the Australian Government. 30 November 2010: 3.

Health Survey that found the health services used by the largest number of people in the year to 30 June 2010 were advice from a pharmacist (91%) and seeing a doctor (89%). Pharmacists and the services they offer were found to be the highest ranking service in the same survey.  

7. In some locations, pharmacies are likely to be ideal sites for the provision of telehealth services due to their:
   a. accessibility;
   b. provision of private counselling areas/rooms; and
   c. availability of highly-trained health professionals.

**Telepharmacy**

8. Although out-of-scope for this Discussion paper, PSA recommends that consideration be given by the Department to the possible future extension of its telehealth initiative to include telepharmacy. Telepharmacy refers to the use of a diverse range of technologies to provide pharmacy services at a distance.  

9. A recent study examined the effectiveness of telepharmacy by assessing pharmaceutical reviews which were performed remotely by a pharmacist using telephone or videoconference. The study’s authors concluded that telepharmacy “may be an effective method of providing pharmaceutical reviews for patients in rural inpatient facilities, without an on-site pharmacist.”  

10. In a recent Position Statement on *Improving Access to Pharmacy Services in Rural and Remote Areas*, PSA calls for the examination of telepharmacy models that aim to improve access to prescription medicines, counselling and information for consumers living in rural and remote areas. A framework for the provision of indirect pharmacy services, such as telepharmacy, is included in pharmacists’ Professional Practice Standards.  

**SUMMARY**

11. PSA supports the proposal that pharmacies be utilised as sites for the provision of telehealth services. PSA similarly supports the proposals for “appropriate remuneration for a facility hosting the patient component of the consultation” and that

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6 Professional Practice Standards. *Op cit.* 33-35
“facilities providing central hosting services could be provided with ongoing funding for the costs associated with this function.”

12. PSA would be pleased to work with the Department in the identification of suitable pharmacies to be considered as sites for the provision of telehealth services and in the development of funding and remuneration models for pharmacies and other facilities hosting such services. PSA can also assist the Department by leveraging its national presence, staff and services to deliver training and support for pharmacists participating in these arrangements.

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27 January 2011

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7 Connecting health services with the future. Op Cit: 4.