

6 February 2012

2407/E

Ms Liz Forman  
Assistant Secretary  
eHealth Strategy and Legislation Branch  
Department of Health and Ageing  
GPO Box 9848  
CANBERRA CITY ACT 2601

Dear Ms Forman

***National Broadband Network (NBN) Enabled Telehealth Pilots Program***

Royal College of Nursing, Australia (RCNA) is pleased to provide the attached submission to the Department of Health and Ageing in response to the *NBN Enabled Telehealth Pilots Program draft funding guidelines*.

RCNA is the peak professional organisation for nurses in Australia. RCNA represents nurses across all areas of practice throughout Australia. RCNA has members in all states and territories of Australia, and internationally. A not-for-profit organisation, RCNA provides a voice for nursing by speaking out on health issues that affect nurses and the community. With representation on government committees and health advisory bodies, RCNA is recognised as a key centre of influence in the health policy arena in Australia. When health policy decisions are made, RCNA presents a professional nursing perspective, independent of political allegiance.

This consultation is of the utmost importance to RCNA due to the role nurses take in aged care, cancer care and palliative care. I look forward to the outcomes of this phase of the consultation process. Please do not hesitate to contact me for further information or discussion on this matter.

Yours sincerely



Kathleen McLaughlin FRCNA  
Deputy CEO

Attachment

## **National Broadband Network (NBN) Enabled Telehealth Pilots Program Funding Guidelines Consultation Draft**

### **Introduction**

Royal College of Nursing, Australia (RCNA) has welcomed the Government's *NBN Enabled Telehealth Pilots Program* as a new government initiative in improved health and aged care.

RCNA has publicised the need for technology and infrastructure supports as well as mechanisms to enable nurses to deliver a greater level of care in aged, palliative and cancer care.

RCNA is committed to the uptake of the telehealth initiative, as well as other e-health initiatives within the sector. However, the pilots program must meet the needs of patients and health practitioners. The areas identified by RCNA and its members reflect concerns that the funding guidelines present a disincentive for organisations to engage in the pilots program. Therefore, we would encourage the inquiry to address these concerns.

### **General comments**

#### **Patient centred care**

RCNA is pleased that the *NBN Enabled Telehealth Pilots Program's funding guidelines* promote the enhanced accessibility of quality care involving a range of health practitioners in aged, cancer and palliative care settings. Nurses and nurse practitioners should be easily accessible in the community and facilitated by current technology. RCNA stresses, however, that the *NBN Enabled Telehealth Pilots Program* must be 'patient centred' rather than 'technology centred' for it to succeed.

Our members have responded to the draft funding guidelines by raising the general concern that the guidelines, (and program's objectives more broadly) fail to focus adequately on the health consumer.

For example, in *Selection Criterion 8: Outcomes and Benefits*, there is a strong focus on enhancing the profile of the NBN through successful delivery of the pilots, through the use of equipment and technology, as opposed to the improvement of care for the patient.

RCNA recognises that it may be difficult to evaluate improved health outcomes after a pilot program and that it may take some time before the improved health outcomes of patients are quantifiable. However, organisations seeking funding for the pilots may be more inclined to do so if it is clear that the NBN Enabled Telehealth Pilots Program's broader purpose is to enhance patient care rather than showcasing the NBN.

#### **Best practice principles and quality of care**

The funding guidelines fail to acknowledge principles of best practice care. Currently there is a lack of scientific evidence supporting the effectiveness of telehealth consultations, and within this context, it is important that principles of best practice quality care are not sidelined in trials of this new technology.

The guidelines should stipulate that organisations participating in the Pilot Program must ensure that their health practitioners follow evidence based practice protocols to support their patients. This may include best practice protocols around communicating with patients, seeking follow-up consultations, record keeping as well as maintaining appropriate codes of conduct and ethical standards that would normally apply to any face-to-face consultations. Whilst it is acknowledged that privacy issues pertaining to technologically assisted consultations have been addressed, these other best practice issues are absent from the funding guidelines document.

## Recognition of health practitioners

Within the funding guidelines there is a distinct lack of recognition or emphasis on the individuals who will be delivering healthcare via the NBN - the healthcare practitioners. Notably absent is a list of eligible health practitioners who would be using the technology to provide care for people in their homes, such as advanced practice nurses and nurse practitioners. This lack of detail renders the guidelines ambiguous, without immediate accessibility for organisations wishing to apply for funding.

Furthermore, such absence of detail does not contribute constructively to the 'culture change' required for telehealth to be embraced at the broader community level. Much of the community indifference and/or resistance to e-health initiatives stems from the perspective that quality care may potentially be overshadowed by technology. Ultimately, technology must meet the needs of patients and health practitioners, rather than the reverse.

## Education and training

The funding guidelines stipulate that technological equipment, computers, service delivery, staffing costs, and administrative costs will be funded by the pilots program. RCNA queries the purpose of this focus, as the successful delivery of telehealth will also need to incorporate significant change management in the health care sector, which will include education and training of many nurses, midwives and nurse practitioners.

There is a lack of acknowledgment of the need to implement this change through the training and education of health practitioners. While RCNA supports the development of e-Health initiatives such as the *NBN Enabled Telehealth Pilots Program*, a lack of comprehensive support to staff delivering the pilots may compromise the integrity of the pilot program overall.

## Information technology standards

RCNA reiterates the point that adequate funding and resources must be available to aged care, cancer care and palliative care service providers to support e-Health teaching, training and change management with regard to information technologies. RCNA strongly recommends the introduction of national standards relating to information technology and computer skills to ensure future e-Health systems are optimised within these health care sectors.

## Contact details

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