

## **Health Technology Assessment of providing an alternative telephone pathway for acute, non-urgent medical care needs in the pre-hospital setting.**

### **Public Consultation feedback form**

The Health Information and Quality Authority (HIQA) is holding a six-week public consultation to give people an opportunity to provide feedback on the health technology assessment (HTA) of providing a telephone pathway for acute, non-urgent medical care needs in the pre-hospital setting.

Your views are important to us. HIQA will carefully assess all feedback received and incorporate feedback into the report, where appropriate.

The final HTA and a statement of outcomes report (a summary of the consultation responses) will be published on HIQA's website once the HTA has been completed.

**The closing date for the public consultation is 5pm on Wednesday 18 June 2025.**

## How to provide feedback:

- If you are commenting in a personal capacity, there is no need to provide your name or any other personal information.
- If you are commenting on behalf of an organisation, please combine all feedback from your organisation into one submission form. We will request a name and contact number for a designated representative from your organisation in case we need to clarify your feedback.
- If your feedback contains any commercially sensitive or confidential information, please highlight this at the time of submission, so it can be excluded from the summary of feedback that will be published by HIQA.
- Please spell out any abbreviations that you use.

You can **email** the completed form to [consultation@hqa.ie](mailto:consultation@hqa.ie)

### OR

Print the consultation feedback form and **post** the completed form to:

Health Information and Quality Authority  
Public consultation for Alternative Telephone Pathway  
Health Technology Assessment  
Dublin Regional Office  
George's Court, George's Lane  
Smithfield, Dublin 7  
D07 E98Y

## Data protection and Freedom of Information

HIQA will only collect personal information, such as the names of individuals who provided feedback or any other personal details during this consultation, for the purposes of seeking clarification on your feedback, if necessary. No personal information will be included in the stakeholder consultation document that will be published by HIQA.

Any response you provide will be held securely and anonymised. Information provided in your response, for example, an anecdote or statement about an experience may be included in the statement of outcomes that will be published by HIQA at the end of the HTA process. However, information will be provided in a manner which protects the privacy of respondents. All personal information will be deleted once no longer needed, in line with HIQA's record retention policy.

For further information on how HIQA uses personal information, please see our Privacy Notice available [here](#). If you have any concerns regarding your personal information, please contact HIQA's Data Protection Officer on [dpo@hiqa.ie](mailto:dpo@hiqa.ie).

Please note that HIQA is subject to the Freedom of Information (FOI) Act and the statutory Code of Practice in relation to FOI. We cannot give you an assurance that confidentiality can be maintained in all circumstances due to the requirements of the FOI Act.

**I agree to take part in the public consultation**

## 1. About you

### 1.1 Your name:

Ryan Duffy

### 1.2 Are you providing feedback as:

- an individual
- on behalf of an organisation

### 1.3 If answer is 'on behalf of an organisation', please give the name of the organisation:

PSI- The Pharmacy Regulator

**If applicable, for clarification purposes, please provide your name, your role in the above organisation and your contact details:**

Ryan Duffy, Strategic Policy Officer, ryan.duffy@psi.ie

**You can request that your organisation's name be kept confidential and excluded from the published summary of responses:**

- Do not publish organisation name
- Publish organisation name

**This form contains two questions focused on the draft assessment. These relate to (i) general or specific feedback on the draft assessment, and (ii) the clarity or presentation of the draft report.**

**These questions are presented on the following two pages.**

## 2. Your feedback on the draft health technology assessment

### 2.1 Please provide any general or specific feedback you have on the draft assessment. Where applicable, please specify the section of the draft assessment to which you are referring.

The Pharmaceutical Society of Ireland (PSI) welcomes the opportunity to provide feedback on the Health Information and Quality Authority's draft health technology assessment (HTA) of an alternative telephone triage pathway. The PSI recognises the potential benefits of this initiative to improve patient access, provide standardised care, and alleviate pressure on other parts of the health system, including emergency services. Our observations are primarily focussed on governance, medication safety, and the role of pharmacists in the pathway:

#### 1. Workforce Planning and the Role of Pharmacists (Section 5: Organisational and System Implications; Section 6: Economic Evaluation)

The draft assessment presents a thoughtful analysis of the triage workforce, distinguishing between clinical and non-clinical call handlers. We welcome the recognition of the valuable role that community pharmacists currently play in responding to symptoms and triaging. This acknowledgment reflects the understanding of and respect for pharmacists' expertise and their potential contribution to triage and support clinical decision-making processes within a future telephone triage pathway. We would suggest that further elaboration will be needed on the nature and extent of pharmacists' involvement in any future service, including the impact on existing workforce and associated workforce planning considerations.

#### 2. Medication Safety and Integration with Pharmacy Services

We suggest the report could consider in more detail how the proposed triage pathway will interact with existing community pharmacy services, and its role in supporting safe and effective use of medicines. We would recommend considering the incorporation of how integration of community pharmacy into the triage process could be best achieved. This could include areas such as protocols for onward referral, access to emergency supplies of medicines, and communication pathways to ensure continuity of care following telephone consultations. Following the implementation of the Common Conditions Service, there will also be the potential for conditions covered by this service to be signposted to as part of the triage pathway, and it may be worth referencing plans to introduce this service later this year.

#### 3. Continuity of Care and Communication with Primary Care Providers

The draft HTA proposes the use of the alternative telephone triage service to redirect patients to more appropriate services, including general practice. However, the current lack of a national shared care record in Ireland poses challenges to continuity of care when a patient is advised to attend a GP or other healthcare professional urgently. Implementation of the shared care record would be a key enabler to ensure appropriate information is accessible and to reduce duplication.

We would recommend that any model would also include clear protocols for when it is appropriate to communicate with the patient's GP or primary care team, e.g., when urgent in-person follow-up is advised.

## **2.2 Please outline any issues with the clarity or presentation of the draft assessment. In your response, where applicable, please specify the section to which you are referring.**

The document is highly informative and reflects a significant depth of analysis across multiple domains. However, its overall length and density may present challenges for readers seeking to navigate the report efficiently, particularly those without a technical or clinical background.

Figures such as workforce flow diagrams are helpful in illustrating key concepts, but these are often embedded within lengthy narrative sections, which may limit their effectiveness in clearly conveying the intended messages.

We would recommend expanding the use of summary boxes, infographics, and visual aids to distil complex organisational and system content into more accessible formats. The inclusion of the brief key-point sections at the start of each major chapter is very helpful.

The PSI is supportive of the development of a high-quality, patient-centred telephone triage system. We welcome the comprehensive nature of the draft HTA and appreciate the opportunity to provide input. We look forward to continued engagement in this process and remain available to provide further input or clarification as required

**Thank you for taking the time to give us your views**

After the closing date, we will carefully access all feedback and incorporate it into the report, where appropriate. The final report and the Statement of Outcomes (a summary of responses) will be published on [www.hiqa.ie](http://www.hiqa.ie)

If you have any questions, please contact the evaluation team at [consultation@hiqa.ie](mailto:consultation@hiqa.ie) or by phoning: (021) 240 9300.

**Please ensure that you return your form to us either by email or post, to reach us by Wednesday 18 June 2025.**