STANDARDS
Australia

22 November 2013

PCEHR Review
pcehrreview@pcehrreview.gov.au

Dear Sir/Madam

Standards Australia Submission to the Panel for the Review of Personally Controlled Electronic Health Records

Standards Australia appreciates the opportunity to provide a submission to the Panel for the Review of Personally Controlled Electronic Health Records (PCEHR).

As the independent facilitator of technical standards development, our comments are limited to the matters in which we have been involved from a process perspective.

We have attached a list of organisations (Appendix A) represented on our technical committees who will no doubt comment on matters related to the PCEHR beyond the standards development program.

Standards development projects are only approved by Standards Australia on the basis of a demonstrated net benefit to the community as a whole. The process of standards development is rigorous and is based on the principles of transparency, balance of interests and consensus. Where there is agreement on broad policy matters amongst stakeholders, it is more likely that technical standards are developed in an efficient and timely manner.

In the course of the development of PCEHR technical standards, we have observed the absence of agreement on e-Health policy matters amongst stakeholder. This has posed challenges to developing timely and widely accepted technical standards.

If more work was undertaken by government to establish agreement on e-Health policy matters amongst health informatics stakeholder groups, it would be easier to deliver consensus based technical solutions.

Response to relevant areas of focus

1. **Your experience on the level of consultation with key stakeholders during the development phase**

Standards Australia is actively engaged with stakeholders (Appendix A) to discuss their views on e-Health standards development and the PCEHR.

Through these discussions, we have noted that there are some fundamental e-Health matters where agreement has not been reached between the clinical peak bodies and other stakeholder groups including government, which are then reflected through the standards development process.

The gap, or perceived gap, in understanding and engagement between the Department of Health, NEHTA and peak bodies on e-Health policy matters has resulted in the delays and disruptions in the delivery of PCEHR technical standards. This gap may also be a contributing factor in the Panel's assertion of a "slow take up of the [PCEHR] platform".

This issue must be addressed in order for the standards development work program to progress efficiently and effectively.

Given the apparent lack of acceptance on matters of PCEHR policy by peak representative bodies within the health informatics stakeholder community, Standards Australia believes it necessary to ensure a wider discussion to firstly achieve acceptance of e-Health policy. This will allow the standards development program to focus on technical achievement of agreed policy objectives. We have made this point consistently to government through the course of 2013.

In the view of Standards Australia, this would greatly assist in efforts to ensure that the standards development work program will be able to progress independently of discourse arising from first principle e-Health policy matters.

Wider agreement on policy matters relating to the PCEHR will lead to a collegial health informatics stakeholder community, a more effective and efficient standards development environment and ultimately a more widely acceptable and employable PCEHR platform.

Standards Australia suggests the following actions relating to standards development:

- The current PCEHR standards development work program at Standards Australia should be reviewed by the Department of Health and the relevant stakeholders. Following the review it should be refined to ensure that it meets the expectations of the Department of Health, state and territory governments, clinical colleges and the wider health informatics technical standards stakeholder community;

- That e-Health policy relating to PCEHR should be developed by the Department of Health in consultation with relevant stakeholders, health informatics peak representative bodies and Standards Australia to ensure that there is wide

acceptance and understanding of the policy – as it impacts patient safety and outcomes, clinical workflow changes, and business process changes across the sector. This can then be translated into standards development activity; and

- Any future PCEHR standards development work program must be referenced back to the accepted PCEHR e-Health policy and a clearly articulated standards development proposition which deals with the scope of the work and the intended use of the standard in achieving the PCEHR e-Health policy.

Standards Australia is willing to provide support and assistance to implement these actions as well as any decisions of the review panel regarding the PCEHR.

Background to Standards Australia's role in e-Health standards development

As the nation's peak non-government standards organisation, Standards Australia has been selected by the Commonwealth Government to independently facilitate the development of contemporary and internationally aligned standards in Australia.

Work in relation to Personally Controlled Electronic Health Records (PCEHR) technical standards development is undertaken by the Standards Australia IT-014 Health informatics technical committee (IT-014).

The Commonwealth Department of Health has engaged Standards Australia to facilitate the development of Australian Health Informatics Standards for more than a decade. In that time, through its consultation and consensus model, Standards Australia has published important health informatics Standards, Technical Specifications and Handbooks relating to PCEHR, Electronic Transfer of Prescriptions (ETP), Telehealth and other subsectors of health informatics. These publications are intended to assist the Department of Health and the health informatics stakeholder community to develop a common set of rules by which to deliver e-Health to the wider Australian community.

In the 2012-2013 financial year alone, SA published a total of 14 complex health informatics documents representing an accumulative 1600 pages. Recently, the work of IT-014 relating to the development of PCEHR has been the subject of contention by members of the technical committee and by the wider health informatics stakeholder community, including health informatics peak representative bodies.

Standards Australia would appreciate the opportunity to discuss the matters raised in this submission with the Panel in due course.

Yours sincerely

Bronwyn Evans

Dr Bronwyn Evans
Chief Executive Officer

Appendix A – Stakeholder List

In the course of e-Health standards development work, Standards Australia has engaged with and sought the views of the following health informatics stakeholder organisations on the topic of PCEHR standards:

- Royal Australian College of General Practitioners
- National ICT Australia
- Engineers Australia
- Australasian College of Health Informatics
- Integrating the Healthcare Enterprise Australia
- Consumers Federation of Australia
- Royal College of Pathologists of Australasia
- GS1 Australia
- HL7 Australia
- Australian Private Hospitals Association
- Australian Medical Association
- The Royal Australian and New Zealand College of Radiologists
- Aged Care Association Australia
- CSIRO e-Health Research Centre
- Royal Australian College of Medical Administrators
- Edith Cowan University
- Department of Health (Vic)
- University of Western Sydney
- Australian Institute of Health & Welfare
- Australian Information Industry Association
- Department of Human Services
- Department of Health Western Australia
- Health Information Management Association of Australia
- Australian Institute of Radiography
- Australian and New Zealand College of Anaesthetists
- Allied Health Professions Australia Ltd
- Australian College of Nursing
- Australian Commission on Safety and Quality in Healthcare
- Australian Healthcare and Hospitals Association
- The Pharmacy Guild of Australia
- NEHTA
- Department of Health
- Australian Industry Group
- The University of Sydney
- Services for Australian Rural and Remote Allied Health
- Australian Association of Pathology Practices Inc
- Health Informatics Society of Australia
- Department of Health (South Australia)

- Department of Human Services
- Consumers' Health Forum of Australia
- Queensland Health
- Medical Software Industry Association
- NSW Ministry of Health
- Royal Australian College of General Practitioners
- Australian Institute of Health & Welfare