**ESR response to consultation on the eHealth Action Plan (eHAP) 2012-2020
May 2011**

Benefits of eHealth solutions

In your view, what are the main benefits you expect from the large scale deployment of eHealth solutions?

- Facilitate the exchange of patient records and remote consultations
- Sharing of expertise for improvement in healthcare
- Allow easier implementation of multicentre research
- Allow to adapt to patient mobility and patient ownership of their medical record
- Better support and training of healthcare professionals
- Lower the cost of data exchange and information sharing

The four objectives of the Action Plan

Taking into consideration the background described in the introduction and existing policy developments made since 2004, do you agree with the four objectives of the Action Plan (listed below)?

Objective 1: Increase awareness of the benefits and opportunities of eHealth, and empower citizens, patients and healthcare professionals

    a) Yes, I agree

Objective 2: Address issues currently impeding eHealth interoperability

    b) Yes, I partially agree

Objective 3: Improve legal certainty for eHealth

    b) Yes, I agree

Comment:

EHealth is a new and promising technology that provides not only tremendous progress in healthcare, but could also lead to potential threats to the safety of patients, given the fact that ICT solutions are applied to transfer health data, as well as the fact that healthcare services are often provided in another Member State or even in third countries, which implies the need for clear regulation of quality and safety aspects.

EHealth and in particular teleradiology is not properly regulated in Europe. The ESR thus requests that due consideration is be given to the specificities of eHealth and teleradiology in order to ensure utmost patient safety.

Objective 4: Support research and innovation in eHealth and development of a competitive European market

   a) Yes, I agree

Main barriers

What do you consider to be the main barriers preventing the large scale deployment of eHealth solutions? (Please choose max. 5)

- Lack of large scale evidence for potential improvements to healthcare processes
- Lack of leadership (policy makers, local managers)
- Lack of interoperability
- Lack of concrete examples and proof of concept projects

In your view, how should the European Commission contribute to addressing the barriers you selected above, and provide incentives to promote eHealth solutions?

- Facilitate cooperation between Member States and/or regions to address common challenges
- Support systematic evaluation of the benefits and costs, effectiveness/usefulness of eHealth solutions
- Support deployment of eHealth services/solutions based on evidence
- Enhance awareness of benefits and opportunities of eHealth

Objective 1: Increase awareness of the benefits and opportunities of eHealth, and empower citizens, patients and healthcare professionals

In your view, what actions should the European Commission consider to improve awareness and empowerment of citizens and patients?

Patients need to trust a system that they will use, and also they have to be convinced that it is reliable, robust and stable, and most importantly it has to be easy to use. The only way to achieve such acceptance, pilot studies must be used as demonstrators. The European Commission should encourage and support competitive projects and "proof of concepts" to increase the awareness of benefits and opportunities of eHealth.

In your view, what actions should the European Commission consider to improve healthcare professionals' awareness and acceptance?

Healthcare professionals need to be convinced that new paradigms of eHealth offer them better and more efficient workflow and should facilitate and improve patient management. They need to see the added value and convenience of eHealth for their daily practice. It is also important to reduce the burden and technical difficulties and systems should be easily accessible. Besides, given the medic-economical constrains and financial pressure of healthcare, eHealth services should be at low

cost and heavily sponsored. The EC could provide financial support to maintain systems at an affordable level more compatible with the financial constrains.

In your view, in which of the areas listed below European cooperation is most important? (Please choose max. 3 options)

- ICT systems for clinical use (decision support systems, HER, ePrescription, Radiology Information Systems etc.)
- ICT systems for patients/ individuals (lifestyle, prevention, monitoring)
- Medical Social Networks!

Objective 2: Address issues to achieve eHealth Interoperability

The Commission Recommendation on cross-border interoperability of electronic health record systems and a number of studies like „Interoperable eHealth is worth it" or „Semantic Interoperability" have analysed specific areas of eHealth interoperability.

More recently, in 2010, the Calliope Thematic Network published a report called "EU eHealth Interoperability Roadmap" in which the Network makes several recommendations to promote eHealth interoperability in Europe.

In your view, in which of the areas listed below European cooperation is most important? (Please choose max. 3 options)

- Taking steps to achieve secure, unambiguous and portable electronic identification of EU citizens
- Taking steps to advance technical interoperability to facilitate de-fragmentation of the eHealth market
- Taking steps to address lack of financial resources – through coordination, support actions, pilots, knowledge sharing, etc.

A European Interoperability Framework could be developed to provide support to Member States and stakeholders to solve interoperability issues. In your view, in which of the areas listed below is European cooperation most important? (Please choose max. 3 options)

- the harmonised standards, profiles and technical specifications to be used to ensure cross border eHealth Interoperability
- defining common interoperability use cases for cross-border healthcare
- defining measures to achieve convergence of national eHealth interoperability frameworks

Objective 3: Improve legal certainty for eHealth

In your view, how should the European Commission address legal issues related to eHealth? (Please choose max. 3 options)

- Propose a European legal framework to cover the rights of users of eHealth services in cross-border situations
- Encourage professional associations, scientific societies and civil society representatives to promote best practices through the development of

COMMENT:

- Teleradiology should be explicitly defined as a medical act in order to ensure quality of care and patient safety. The same level of guarantee, in terms of quality and safety, must be applied to these services as compared to "standard" medical acts.

- The ESR strongly advocates that the responsibility for the quality and standards (regulation) of teleradiology and telemedicine should remain with the member state of affiliation in the interest of utmost patient safety. It should therefore be the responsibility of the member states to extend their national medical regulation to telemedicine and teleradiology (national registration, medical language skills, CPD achievements).
Member states should ensure for the safety of the patient that doctors undertaking cross border telemedicine and teleradiology should have the equivalent regulatory requirement to those of the member state of affiliation.

- The responsibility/liability for cross-border teleradiology services shall lie with the member state of affiliation and not with the country providing the healthcare service.

- The ESR strongly advocates that the patients need to give informed consent before teleradiology is performed and receive full information that their health data are transferred to another country and that their images are being reported or consulted by individuals who have had no direct contact with the patient.

In your view, which areas should the European Commission focus on? (Please choose max. 3 options)
- Data protection
- Liability
- Licensing and accreditation of professionals and health care providers

Objective 4: Support research and innovation in eHealth and development of a competitive European and global market

In your view, how should the European Commission support innovation? (Please choose max. 3 options)

- Provide funding for the scaling up of innovative eHealth solutions, for example by facilitation deployment of research results
- Provide more flexible financing mechanisms to support research and innovation

- Support collection, dissemination and analysis of information on innovative healthcare services

COMMENT:
ESR would suggest putting a high priority on the development of Clinical Decision Support for e prescription and structured iconotheques in the context of population imaging. Funding for research in this area should be provided.

In your view, in which of the areas listed below should the European Commission cooperate with international partners? (Please choose max. 3 options)

- Taking steps to advance interoperability
- Support R&D to advance new innovative solutions (incl. Virtual Physiological
- Promote deployment of telemedicine services